DRAFT
HAZARDOUS WASTE MODIFIED OPERATING PERMIT

SYNGENTA CROP PROTECTION, INC.
ST. GABRIEL, LOUISIANA
LAD 053783445-OP-RN-1-MO-1
AI#2367/PER20070027

RECORD CENTER COPY

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SYNGENTA CROP PROTECTION, INC.
DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT

The LDEQ, Office of Environmental Services, is accepting written comments on the draft hazardous waste operating permit modification for Syngenta Crop Protection, Inc., Post Office Box 11, St. Gabriel, Louisiana, 70776, for the St. Gabriel Facility. **The facility is located at 3905 Highway 75, St. Gabriel, Iberville Parish.**

Syngenta Crop Protection, Inc. requested a Class 3 Permit Modification in accordance with LAC 33:V.323.B.2.b and LAC 33:V.703.C, that addressed several conditions in the effective hazardous waste permit. The draft modified permit includes several proposed modified permit conditions which take into account and address the facts provided in the Syngenta' submittals (the Class 2 and 3 Modification requests were consolidated into 1 Class 3 Modification in the April 23, 2008 letter per Syngenta's request) dated December 7, 2007, February 15, 2008, May 27, 2008, and May 28, 2008.

•Condition III, Table 1 (3) Existing Container Storage, Condition; V.B Table 8; and Condition IV.C.1 have been revised to make the Tank Unloading Area into a Tank Loading and Unloading Area. Syngenta ceased operation of the Rotary Kiln and plans to send the waste that was to be incinerated for outside disposal. In order to send the waste for outside disposal the Tank Unloading Area has to be converted to a Tank Loading and Unloading Area.

•Condition VII (Current HSWA Language) will be replaced with Conditions VII and VIII (new Corrective Action Strategy Language).

•Condition VIII Tables 2 and 3 will be revised with updated current information on Syngenta's SWMUs and AOC's.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, October 13, 2008.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The Permit Modification Requests are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information**

can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.

An additional copy may be reviewed at the Iberville Parish Library-East Iberville Branch, 5715 Monticello St., St. Gabriel, Louisiana 70776.

Previous notices have been published in The Advocate on June 7, 2008 and The Post South on June 5, 2008.

Inquiries or requests for additional information regarding this permit action should be directed to Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3070.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed on the LDEQ permits public webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 2367, Permit Number LAD053783445-OP-RN-1-MO-1, and Activity Number PER20070027.

Scheduled Publication Date: August 21, 2008

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

CERTIFIED MAIL 70032260000593243570

Mr. W. Ralph Caddell
Syngenta Crop Protection, Inc
P.O. Box 11
St. Gabriel, LA 70776

RE: Syngenta Crop Protection, Inc.
LAD 053 783 445-RN-OP-1-MO-1
Agency Interest No. 2367/PER20070027
Draft Modified Hazardous Waste Operating Permit

Dear Mr. Caddell:

Attached, is your copy of the Syngenta Crop Protection, Inc., draft modified hazardous waste operating permit, LAD 053 783 445-RN-OP-1-MO-1, which incorporates language pertaining to the operation and management of hazardous waste units at the Syngenta Crop Protection, Inc., St. Gabriel Site.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft modified hazardous waste operating permit By requests and if the Department finds a significant degree of public interest, a public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing, if requested, and specific dates for the beginning and ending of the comment period are contained in the attached public notice.

Prior to taking a final action on the draft modified permit, the administrative authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision is in accordance with LAC 33:V.705.

Please reference Agency Interest Number 2367, Activity Number PER20070027, and LAD053783445-RN-OP-1-MO-1 on all future correspondence. Should you have any questions concerning this matter, please contact Ms. Soumaya Ghosn, Public Participation Group, at (225) 219-3276 or Mr. Keith R. Williams, Permits Division, at (225) 219-3070.

Sincerely,

Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

ale

Attachment

FACT SHEET

FACT SHEET

FOR THE DRAFT MODIFIED OPERATING PERMIT
PREPARED FOR

Syngenta Crop Protection, Inc.
Iberville Parish
St. Gabriel, Louisiana
EPA ID# LAD 053 783 445
Agency Interest # 2367
PER20070027

Permit Number LAD053 783 445-RN-OP-1-MO-1

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft modified hazardous waste operating permit for Syngenta Crop Protection, Inc. (Syngenta), EPA ID Number LAD 053 783 445, Agency Interest Number 2367, for the facility located in St. Gabriel, Iberville Parish, Louisiana.

In accordance with LAC 33:V.323.B.2.b and LAC 33:V.323B.2.c.ii, Syngenta is proposing several modifications to permit conditions based on information provide to the Administrative Authority by Syngenta justifying the application of the modified permit conditions. The proposed draft modified hazardous waste operating permit includes several revised permit conditions to the operating renewal permit which became effective on March 14, 2005. Specific information regarding the proposed modified permit conditions is contained in Part III of this fact sheet.

The proposed draft modified operating permit addresses the requirements of LAC 33:V, Subpart 1 and the Resource Conservation and Recovery Act (RCRA).

A. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permit decision process. The Waste Permits Division of the Louisiana Department of the Environmental Quality (LDEQ) has determined that the proposed permit modification constitutes a Class 3 modification and, therefore, has prepared a draft permit in accordance with LAC 33:V.V.323.B.2.b and LAC 33:V.703.C. The draft permit incorporates the proposed modifications and sets forth all applicable

conditions with which the Permittee must comply during the life of the permit.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the Permittee to comply with the requirements of the LAC 33:V, Subpart 1.

The public is given a minimum of forty-five (45) days to review and comment on the draft modified permit. The Administrative Authority, prior to making a decision or taking any final action on the draft modified permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the draft modified permit in accordance with LAC 33:V.705.

B. DRAFT MODIFIED PERMIT

The Administrative Authority has reviewed all pertinent technical information regarding the proposed revised permit conditions and has made a tentative determination that the proposed revised permit conditions are warranted. Therefore, the LDEQ has prepared a draft modified permit setting forth certain specific conditions pertaining to the operation, maintenance, and closure of the listed facilities.

This draft modified operating permit is a tentative determination and is not the final decision of the Administrative Authority.

C. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given forty-five (45) days to comment on each draft modified permit prepared under the authority of the LDEQ.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the strikeouts and/or the underlined text of the draft modified permit must dos o within this comment period. Only the modified text of the draft modified permit is open for comment. (The entire HSWA section- Condition VII, has been replace with the updated Corrective Action Strategy Language and is now conditions VII and VIII.)

A public hearing may be held, if requested, or if the draft permit generates a significant amount of public interest, on the date, at the location and time provided in the public notice of the hearing.

Public notice of the proposed permitting action and other hearing shall be published in specific newspapers, announced on the designated radio station, and mailed to those persons contained on the facilities mailing list.

D. LOCATIONS OF AVAILABLE INFORMATION

The administrative record for Syngenta Crop Protection Inc., including the draft modified permit and supporting documents are on file at the LDEQ, Public Records Center, 1st Floor, 602 N. Fifth Street, Baton Rouge, LA

These documents are available for review and copying (all documents copied will be subject to a $0.25 charge per copy page). Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday-Friday (except holidays).

In addition, a copy of the draft modified operating permit, fact sheet, and supporting documents are available for review at the **Iberville Parish Library-East Iberville Branch, 5715 Monticello St., St. Gabriel, Louisiana; Iberville Parish Library, 24605 J. Gerald Berret Blvd., Plaquemine, Louisiana and the Ascension Parish Library, 708 South Irma Blvd., Gonzales, Louisiana.**

E. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft modified operating permit, requests for information, including copies of the draft renewal operating permit and fact sheet, to the administrative authority at the address written below, **no later than 12:30 p.m., on the closing date of the comment period.**

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Public Participation Group
P.O. Box 4313
Baton Rouge, LA 70821-4313

All comments should include the name and address of the writer and a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based.

Any technical questions regarding this draft renewal permit should be addressed to:

Mr. Keith R. Williams
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3070 or fax (225) 219-3158

II. DESCRIPTION OF OVERALL SITE

Syngenta Crop Production, Inc., St. Gabriel site manufactures and formulates pesticides and specialty chemicals. Specific processes include the manufacture, formulation and packaging of s-triazine herbicides; manufacture of hydrogen cyanide, a raw material; manufacture, formulation and packaging activities for various other pesticides, flourotriazine reactive dyes and specialty chemicals; and development and supportive activities for the above which include effluent treatment systems, maintenance, utilities, pilot plant, chemical development and analytical and quality control. As a result of various processes employed at the St. Gabriel facility, by products and non-recyclable (hazardous and non-hazardous) wastes are produced, stored and treated by incineration on site. Compatible and non-compatible hazardous wastes generated by the other off-site Syngenta facilities, subsidiaries, and associated facilities are also stored and incinerated in the Multi-Purpose Rotary Kiln Incinerator.

III. HAZARDOUS WASTE FACILITIES

The Syngenta St. Gabriel site has an effective hazardous waste operating permit (LAD 053783445-OP-RN-1) governing the operation of three (3) hazardous waste container storage areas, twenty-one (21) hazardous waste tanks (12-existing, 9-proposed), and the Multi-Purpose Rotary Kiln Incinerator and associated units, which will operate in accordance with conditions in the permit as specified by the regulatory requirements for Hazardous Waste Combustor (HWC) - Maximum Achievable Control Technology (MACT)/40 CFR 63, Subpart EEE. The hazardous waste operating permit became effective on March 14, 2005. Subsequent to the hazardous was permit becoming effective, Syngenta provided additional information to the Administrative Authority, in the form of a Class 3 Permit Modification in accordance with LAC 33:V.323.B.2.b and LAC 33:V.703.C, that addressed several conditions in the effective hazardous waste permit. The draft modified permit includes several proposed modified permit conditions which take into account and address the facts provided in the Syngenta' submittals (the Class 2 and 3 Modification requests were consolidated into 1 Class 3 Modification in the April 23, 2008 letter per Syngenta's request) dated December 7, 2007, February 15, 2008, May 27, 2008, and May 28, 2008. A summary of the rationale for the proposed modifications is detailed below.

- Condition III, Table 1 (3) Existing Container Storage, Condition; V.B Table 8; and Condition IV.C.1 have been revised to make the Tank Unloading Area into a Tank Loading and Unloading Area. Syngenta ceased operation of the Rotary Kiln and plans to send the waste that was to be incinerated for outside disposal. In order to send the waste for outside disposal the Tank Unloading Area has to be converted to a Tank Loading and Unloading Area.

- Condition VII (Current HSWA Language) will be replaced with Conditions VII and VIII (new Corrective Action Strategy Language).

- Condition VIII Tables 2 and 3 will be revised with updated current information on Syngenta's SWMUs and AOC's.

IV. FINANCIAL AND LIABILITY REQUIREMENTS

Syngenta has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V, Chapters 37 and 43.

MODIFIED SIGNATURE PAGE

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MODIFIED PERMIT

MODIFICATION AUTHORIZATION

PERMITTEE: SYNGENTA CROP PROTECTION, INC

PERMIT NUMBER: LAD053783445-OP-RN-1-MO-1

AGENCY INTEREST: AI 2367

PERMIT ACTIVITY NO.: PER 20070027

FACILITY: IBERVILLE PARISH

LOCATION: 3905 HIGHWAY 75
St. Gabriel, LOUISIANA 70776

This modification applies to the permit LAD053783445-OP-RN-1 issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder to Syngenta Crop Protection, LLC, (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage, and Disposal facility (TSD) Louisiana, at latitude 30° 15' 011" and longitude 91° 06' 033" and which became effective March 14, 2005.

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The Permittee must comply with all terms and conditions of this permit as modified according to the procedures and under the authority of the Louisiana Administrative Code (LAC) 33:V, Chapter 3. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation,

and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This modified permit shall be effective as of_____, and shall remain in effect until March 15, 2015, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within thirty (30) days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

LA. Department of Environmental Quality
Office of the Secretary
Attention: Hearing Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

_____DRAFT_____ _____
Cheryl Sonnier Nolan, Assistant Secretary Date
Louisiana Department of Environmental Quality

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SYNGENTA CROP PROTECTION, INC.
DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT

The LDEQ, Office of Environmental Services, is accepting written comments on the draft hazardous waste operating permit modification for Syngenta Crop Protection, Inc., Post Office Box 11, St. Gabriel, Louisiana, 70776, for the St. Gabriel Facility. **The facility is located at 3905 Highway 75, St. Gabriel, Iberville Parish.**

Syngenta Crop Protection, Inc. requested a Class 3 Permit Modification in accordance with LAC 33:V.323.B.2.b and LAC 33:V.703.C, that addressed several conditions in the effective hazardous waste permit. The draft modified permit includes several proposed modified permit conditions which take into account and address the facts provided in the Syngenta' submittals (the Class 2 and 3 Modification requests were consolidated into 1 Class 3 Modification in the April 23, 2008 letter per Syngenta's request) dated December 7, 2007, February 15, 2008, May 27, 2008, and May 28, 2008.

•Condition III, Table 1 (3) Existing Container Storage, Condition; V.B Table 8; and Condition IV.C.1 have been revised to make the Tank Unloading Area into a Tank Loading and Unloading Area. Syngenta ceased operation of the Rotary Kiln and plans to send the waste that was to be incinerated for outside disposal. In order to send the waste for outside disposal the Tank Unloading Area has to be converted to a Tank Loading and Unloading Area.

•Condition VII (Current HSWA Language) will be replaced with Conditions VII and VIII (new Corrective Action Strategy Language).

•Condition VIII Tables 2 and 3 will be revised with updated current information on Syngenta's SWMUs and AOC's.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, October 13, 2008.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The Permit Modification Requests are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information**

can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.

An additional copy may be reviewed at the Iberville Parish Library-East Iberville Branch, 5715 Monticello St., St. Gabriel, Louisiana 70776.

Previous notices have been published in The Advocate on June 7, 2008 and The Post South on June 5, 2008.

Inquiries or requests for additional information regarding this permit action should be directed to Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3070.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft permit and associated information can be viewed on the LDEQ permits public webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 2367, Permit Number LAD053783445-OP-RN-1-MO-1, and Activity Number PER20070027.

Scheduled Publication Date: August 21, 2008

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

Via Fax (225) 388-0164, Phone (225) 388-0128

Ms. Susan Bush
Legal Advertising
The Advocate
Post Office Box 588
Baton Rouge, LA 70821-0588

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a **regular legal ad in the Advocate once only on Thursday, August 21, 2008.** The legal notice itself will also be sent via email, as an attachment, to legal.ads@theadvocate.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification was made in the time specified, we are requesting that you sign and date the enclosed Verification by Newspaper and fax to the attention of Ms. Laura Ambeau (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277 or email laura.ambeau@la.gov.

Charges for this service should be billed to:

Mr. Richard B. Boudreau
Sr. Staff Engineer, Environmental
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA 70776
225-642-1257

The original proof of publication should be mailed to the attention of Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments/2

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the _____(date of publication) edition of the **Advocate**:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

The Advocate

By: _____ Date: _____

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau at (225) 325-8157.

PLEASE NOTE:
THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF AN AFFIDAVIT, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

Via Fax (225) 687-1814

Ms. Liz Troxclair
Legal Advertising
The Plaquemine Post South
Post Office Box 589
Plaquemine, LA 70765-0589

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Ms. Troxclair:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in The Plaquemine Post South *once only* on **Thursday, August 21, 2008.** You will also receive a copy of the legal notice itself via email at pscirculation@postsouth.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau (225) 219-3309 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277or email laura.ambeau@la.gov.

Charges for this service should be billed to:

Mr. Richard B. Boudreau
Sr. Staff Engineer, Environmental
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA 70776
225-642-1257

The original proof of publications IN THE FORM OF TEAR SHEETS should be mailed to the attention of Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau
Environmental Scientist, Public Participation Group
LA/Attachments/2

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the _____(date of publication) edition of **The Plaquemine Post South**:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

THE PLAQUEMINE POST SOUTH:

By: _____ Date: _____

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau (225) 219-3309.

PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF A TEAR SHEET, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

Via Fax (225)-231-1879
Phone (225)-335-0216

Mr. Mike Norwood
WJBO-AM
PO Box 14061
Baton Rouge, LA 70898-4061

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Mr. Norwood:

Please broadcast the enclosed public announcement regarding the above referenced facility *once only*, **at around 7:00 am on Thursday, August 21, 2008.** You will also receive a copy of the broadcast via email at mikenorwood@clearchannel.com.

The charges for this service should be billed to:

Mr. Richard B. Boudreau
Sr. Staff Engineer, Environmental
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA 70776
225-642-1257

We are requesting that you sign and date the enclosed 'Verification by Radio Station', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157, as soon as the announcement has been broadcast.

If there is any problem with broadcasting this announcement in its entirety, or if you have any further questions, please contact Ms. Laura Ambeau immediately at (225) 219-3277 or via email at laura.ambeau@la.gov.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA/Attachments/2

VERIFICATION BY RADIO STATION

The undersigned verifies that the attached public announcement, associated with the public notice referenced below, was broadcast on WJBO-AM at _____ (time of day) on the _____ (day) of _____ (month), 2008.

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

WJBO-AM:

By: _____ Date: _____

Please complete and return this form to the address listed below promptly after broadcast of the public service announcement, or fax it to the attention of Laura Ambeau at (225) 325-8157.

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

LDEQ
RADIO ANNOUNCEMENT
DRAFT HAZARDOUS WASTE OPERATING PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, will receive comments on the draft hazardous waste operating permit modification for Syngenta Crop Protection, Inc., P. O. Box 11, St. Gabriel, LA 70776 for the St. Gabriel Facility. **The facility is located at 3905 Highway 75, St. Gabriel, Iberville Parish.**

The public comment period will end on Monday, October 13, 2008 at 12:30 p.m.

A copy of the draft hazardous waste operating permit modification and related documents are available for review at the Iberville Parish Library-East Iberville Branch, 5715 Monticello Street, St. Gabriel, Headquarters and the Louisiana Department of Environmental Quality Public Records Center in Baton Rouge, LA.

The detailed public notice is scheduled for publication in The Advocate and The Post South on August 21, 2008.

For any inquiries contact LDEQ Customer Service Center at (225) 219-LDEQ, that is (225) 219-5337.

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

CERTIFIED MAIL 70032260000593243570

Mr. W. Ralph Caddell
Syngenta Crop Protection, Inc
P.O. Box 11
St. Gabriel, LA 70776

RE: Syngenta Crop Protection, Inc.
LAD 053 783 445-RN-OP-1-MO-1
Agency Interest No. 2367/PER20070027
Draft Modified Hazardous Waste Operating Permit

Dear Mr. Caddell:

Attached, is your copy of the Syngenta Crop Protection, Inc., draft modified hazardous waste operating permit, LAD 053 783 445-RN-OP-1-MO-1, which incorporates language pertaining to the operation and management of hazardous waste units at the Syngenta Crop Protection, Inc., St. Gabriel Site.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft modified hazardous waste operating permit By requests and if the Department finds a significant degree of public interest, a public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing, if requested, and specific dates for the beginning and ending of the comment period are contained in the attached public notice.

Prior to taking a final action on the draft modified permit, the administrative authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision is in accordance with LAC 33:V.705.

Please reference Agency Interest Number 2367, Activity Number PER20070027, and LAD053783445-RN-OP-1-MO-1 on all future correspondence. Should you have any questions concerning this matter, please contact Ms. Soumaya Ghosn, Public Participation Group, at (225) 219-3276 or Mr. Keith R. Williams, Permits Division, at (225) 219-3070.

Sincerely,

Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

ale

Attachment

VERIFICATION BY FACILITY

The undersigned verifies that the Syngenta Crop Protection, Inc., St. Gabriel Facility has received a copy of the draft hazardous waste operating permit modification and public notice regarding:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

Telephone (225) 642-8380
Fax (225) 642-8381

Lydia Haydel, Director
Iberville Parish Library
East Iberville Branch
5715 Monticello Street
St. Gabriel, LA 70776

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Ms. Haydel:

We request that the enclosed draft hazardous waste operating permit modification document and public notice for the referenced facility, be made available for public review upon receipt. It is imperative that the documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The material should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/2

VERIFICATION BY LIBRARY

The undersigned verifies that the Iberville Parish Library, East Iberville Branch, has received a copy of the technical document material associated with the following public notice:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

IBERVILLE PARISH LIBRARY:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

225-687-3257

Jessel "Mitchell" Ourso, Parish President
Iberville Parish Council
58050 Meriam Street
Plaquemine, LA 70565-0389

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT
CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Parish President Ourso:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste operating permit modification and legal notice that is scheduled to be published in The Advocate and The Post South on August 21, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA

Enclosures/2

VERIFICATION BY PARISH GOVERMENT

The undersigned verifies that the Parish President, Iberville Parish Council has received a copy of the draft hazardous waste operating permit modification regarding:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT
CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Iberville Parish Government:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 12, 2008

Phone (214) 665-6669

Mr. Kishor Fruitwala
U. S. EPA, Region VI
1445 Ross Avenue, Suite 1200
Mail Code: 6PDA
Dallas, Texas 75202-2733

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste operating permit modification and legal notice that is scheduled to be published in The Advocate and The Post South on August 21, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams , LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Enclosures

VERIFICATION BY EPA

The undersigned verifies that the EPA Region VI Office has received a copy of the draft hazardous waste operating permit modification and public notice regarding:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

EPA Region VI:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

August 21, 2008

Phone: (225) 219-3600
Fax: (225) 219-3695

Mr. Bobby Mayweather
Capital Regional Office
602 North 5th Street
Baton Rouge, La. 70821-4312

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Mr. Mayweather:

The Louisiana Department of Environmental Quality (LDEQ) is informing you of the draft hazardous waste operating modification permit and legal notice that is scheduled to be published in The Advocate and The Post South on August 21, 2008.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Enclosures

VERIFICATION BY REGIONAL OFFICE

The undersigned verifies that the Capital Regional Office has received a copy of the draft hazardous waste operating modification permit and public notice regarding:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Capital Regional Office:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

VERIFICATION FOR DELIVERY OF MATERIAL TO BE SCANNED

THIS INFORMATION IS EXPECTED TO BE AVAILABLE ON EDMS
48 HOURS FROM THE DELIVERY DATE

Public Notice Date: Thursday, August 21, 2008

The undersigned verifies that a copy of the public notice and related material for the referenced facility has been received by the First Floor Scanning Center:

RE: REQUEST FOR PUBLIC COMMENT ON THE DRAFT CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

The Material Was Delivered:
By: _____ Date: _____ Time _____

The Public Participation Group contact for this packet of information is
Laura Ambeau, Rm. 321-31, 2-3277

PART A
APPLICATION

United States Environmental Protection Agency

HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 35)	First Name: RICHARD	MI: B.	Last Name: BOUDREAU
	Phone Number: (225) 642-1257		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See instructions on page 35)	Street or P.O. Box: 3905 HWY 75		
	City, Town, or Village: ST. GABRIEL		
	State: LOUISIANA		
	Country: USA		Zip Code: 70776
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: P.O. BOX 18300, 410 SWING ROAD		
	City, Town, or Village: GREENSBORO		
	State: NORTH CAROLINA		
	Country: USA	Zip Code: 27419-8300	Phone Number (336) 632-6000
4. Operator Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: P.O. BOX 11		
	City, Town, or Village: ST. GABRIEL		
	State: LOUISIANA		
	Country: USA	Zip Code: 70776	Phone Number (225) 642-1100
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): LIQUID INCINERATOR - 11/29/1989 (IN-ACTIVE-TO BE CLOSED) MULTI-PURPOSE INCINERATOR-5/15/1996 (ACTIVE-RENEWAL APPLICATION SUBMITTED APRIL 2001)		

6. Other Environmental Permits (See instructions on page 36)

A. Permit Type (Enter code)	B. Permit Number	C. Description
	SEE ATTACHED LISTED IN ITEM 6 ADDENDUM	

7. Nature of Business (Provide a brief description; see instructions on page 37)

SEE ATTACHED IN ITEM 7 ADDENDUM

6. OTHER ENVIRONMENTAL PERMITS (ADDENDUM)

A. Permit Type (Code)	B. Permit Number	C. Description
E	1280-00007-14	State Air Permit
E	1280-0029-08	State Air Permit
E	2871-VO	Tank T-1013-Title V
E	2842-VO	MPF Unit-Title V
E	2793	State Air Permit
E	2718-VO	Environmental Operations-Title V
E	2697	State Air Permit
E	2532	State Air Permit
E	2532-M1	State Air Permit
E	2687	State Air Permit
E	2610-VO	Utilities Area-Title V
N	LAD0005487	NPDES Permit
N	LAD00095478	NPDES Permit
E	GD-047-0224/P-0017	State Solid Waste Permit
R	LAD053783445-MO-1	RCRA Permit
U	94-05 WD; 970940	State UI Permit Well #2
U	94-01 WD; 971203	State UI Permit Well #3
E	2697	State Air Permit
E	2504	State Air Permit
E	2462	State Air Permit
E	GD-047-0224/P-0311	Beneficial Use Permit
E	WP-0926	LWPDS Permit
E	LA-2219-L01	Radiation

7. NATURE OF BUSINESS (ADDENDUM)

On January 1, 2001, Zeneca Ag Products, Inc. merged into Novartis Crop Protection, Inc., with Novartis Crop Protection, Inc. continuing as the surviving corporate entity in the United States. At the same time, on January 1, 2001, Novartis Crop Protection, Inc. changed its name to Syngenta Crop Protection, Inc. The Syngenta Crop Protection, Inc. headquarters are located in Greensboro, North Carolina and is a wholly-owned subsidiary of Syngenta Corporation, whose corporate offices are located in Wilmington, Delaware. On January 1, 2001, the Novartis Crop Protection, Inc., St. Gabriel Plant changed its name to Syngenta Crop Protection, Inc. Also, as of January 1, 2001, the Zeneca Ag Products, Inc., St. Gabriel Plant commenced to consolidate into the former Novartis Crop Protection, Inc., St. Gabriel Plant to become one Syngenta Crop Protection, Inc., St. Gabriel Plant site, under one site manager with one EPA I.D. number, EPA I.D. # LAD053783445-MO-1 and Agency Interest # 2367. The site property description and plot plan have been revised to reflect the new Syngenta Crop Protection, Inc., St. Gabriel Plant site.

The Syngenta Crop Protection, Inc., St. Gabriel facility manufactures and formulates pesticides and specialty chemicals. Specific processes include: 1) manufacture, formulation and packaging of s-triazine herbicides, 2) manufacture of hydrogen cyanide, a raw material, 3) manufacture, formulation and packaging activities for various other pesticides, intermediates and specialty chemicals, and 4) supportive activities for the above which included effluent treatment systems, maintenance, utilities, analytical and quality control. As a result of the various processes employed at the St. Gabriel facility, by-products and non-recyclable (hazardous and non-hazardous) wastes are produced, stored and treated by incineration on-site. Additionally, compatible hazardous and non-hazardous wastes generated by the other off-site Syngenta facilities, subsidiaries and associated facilities are stored and incinerated in the St. Gabriel Plant multi-purpose rotary kiln incinerator and associated facilities.

Plant Operations

The plant operates on a twenty-four (24) hour basis, seven (7) days per week. The Syngenta Crop Protection, Inc., St. Gabriel Plant, is presently classified as a generator, storer and treater and hazardous waste. Some hazardous wastes are recycled by returning to the process from which they were generated or reused in other similar processes.

9. Process Codes and Design Capacities (See instructions on page 37)

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.*

B. PROCESS DESIGN CAPACITY- *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*

2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units for each corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day or Liters Per Day
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards
S06	Containment Building Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, or Refining Furnace	
T88	Titanium Dioxide Chloride Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces Other Industrial Furnaces Listed In 40 CFR §260.10	
T93		
T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
	Miscellaneous (Subpart X)	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Million Btu Per Hour	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu Per Hour	I

8. Process Codes and Design Capacities (*Continued*)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	S	0	1	WAREHOUSE 46000	G	001	
	2	S	0	1	OUTSIDE STORAGE 75000	G	001	
	3	S	0	1	TRUCK UNLOADING 12000	G	001	
	4	S	0	2	TANKS (ORGANIC) 83100**	G	005	
	5	S	0	2	TANKS (AQUEOUS) 93550**	G	003	
	6	S	0	2	TANKS (SOLIDS/SEMI) 37500	G	002	
	7	S	0	2	TANKS (FLUE GAS RESIDUALS) 6400	G	002	
	8	T	0	3	ROTARY KILN 12067	J	001	
	9	T	0	3	SECONDARY COMBUSTION 8200	J	001	
1	0	S	0	2	AQ. TANK (INSTALLED LATER) *94000	G	005	
1	1	S	0	2	ORG TANK (INSTALLED LATERO *69000	G	004	
1	2				**ONE 24,300 GAL TANK COUNTED AS ORG. CAN ALSO BE USED AS AQUEOUS			
1	3				*TO BE INSTALLED AT A LATER DATE			

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (*See Instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes*)

Line Number (Enter #s in sequence with Item 8)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY (1) Amount (Specify)	B. (2) Unit of Measure (Enter code)	C. Process Total Number of Units	D. Description of Process
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

10. Description of Hazardous Wastes (See instructions on page 37)

A. EPA HAZARDOUS WASTE NUMBER - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. ESTIMATED ANNUAL QUANTITY - *For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C. UNIT OF MEASURE - *For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of Item 10.D(1).*
3. *Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)									D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

cription of Hazardous Wastes (*Continued; Additional Sheet*)

ine nber	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
1	D 0 0 1	5000	T	S 0 1 S 0 2 T 0 3	
2	D 0 0 2	500	T	S 0 1 S 0 2 T 0 3	
3	D 0 0 3	200	T	S 0 1 S 0 2 T 0 3	
4	D 0 0 4	20	T	S 0 1 S 0 2 T 0 3	
5	D 0 0 5	10	T	S 0 1 S 0 2 T 0 3	
6	D 0 0 6	10	T	S 0 1 S 0 2 T 0 3	
7	D 0 0 7	100	T	S 0 1 S 0 2 T 0 3	
8	D 0 0 8	10	T	S 0 1 S 0 2 T 0 3	
9	D 0 0 9	10	T	S 0 1 S 0 2 T 0 3	
0	D 0 1 0	10	T	S 0 1 S 0 2 T 0 3	
1	D 0 1 1	10	T	S 0 1 S 0 2 T 0 3	
2	D 0 1 2	10	T	S 0 1 S 0 2 T 0 3	
3	D 0 1 3	20	T	S 0 1 S 0 2 T 0 3	
4	D 0 1 4	10	T	S 0 1 S 0 2 T 0 3	
5	D 0 1 5	10	T	S 0 1 S 0 2 T 0 3	
6	D 0 1 6	100	T	S 0 1 S 0 2 T 0 3	
7	D 0 1 7	10	T	S 0 1 S 0 2 T 0 3	
8	D 0 1 8	50	T	S 0 1 S 0 2 T 0 3	
9	D 0 1 9	200	T	S 0 1 S 0 2 T 0 3	
0	D 0 2 0	1	T	S 0 1 S 0 2 T 0 3	
1	D 0 2 1	100	T	S 0 1 S 0 2 T 0 3	
2	D 0 2 2	500	T	S 0 1 S 0 2 T 0 3	
3	D 0 2 3	1	T	S 0 1 S 0 2 T 0 3	
4	D 0 2 4	1	T	S 0 1 S 0 2 T 0 3	
5	D 0 2 5	1	T	S 0 1 S 0 2 T 0 3	
6	D 0 2 6	1	T	S 0 1 S 0 2 T 0 3	
7	D 0 2 7	10	T	S 0 1 S 0 2 T 0 3	
8	D 0 2 8	10	T	S 0 1 S 0 2 T 0 3	
9	D 0 2 9	10	T	S 0 1 S 0 2 T 0 3	
0	D 0 3 0	1	T	S 0 1 S 0 2 T 0 3	
1	D 0 3 1	1	T	S 0 1 S 0 2 T 0 3	
2	D 0 3 2	1	T	S 0 1 S 0 2 T 0 3	
3	D 0 3 3	1	T	S 0 1 S 0 2 T 0 3	

Description of Hazardous Wastes (Continued; Additional Sheet)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
4	D034	1	T	S01 S02 T03	
5	D035	10	T	S01 S02 T03	
6	D036	1	T	S01 S02 T03	
7	D037	1	T	S01 S02 T03	
8	D038	10	T	S01 S02 T03	
9	D039	500	T	S01 S02 T03	
0	D040	100	T	S01 S02 T03	
1	D041	1	T	S01 S02 T03	
2	D042	1	T	S01 S02 T03	
3	D043	1	T	S01 S02 T03	
4	F001	10	T	S01 S02 T03	
5	F002	100	T	S01 S02 T03	
6	F003	1000	T	S01 S02 T03	
7	F004	10	T	S01 S02 T03	
8	F005	1000	T	S01 S02 T03	
9	F024	1	T	S01 S02 T03	
	K157	1	T	S01 S02 T03	
	K158	1	T	S01 S02 T03	
2	K159	100	T	S01 S02 T03	
3	P001	1	T	S01 S02 T03	
4	P002	1	T	S01 S02 T03	
5	P003	1	T	S01 S02 T03	
6	P004	1	T	S01 S02 T03	
7	P005	1	T	S01 S02 T03	
8	P006	1	T	S01 S02 T03	
9	P007	1	T	S01 S02 T03	
0	P008	1	T	S01 S02 T03	
1	P009	1	T	S01 S02 T03	
2	P010	1	T	S01	
3	P011	1	T	S01	
4	P012	1	T	S01	
5	P013	1	T	S01	
6	P014	1	T	S01 S02 T03	

scription of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
6 7	P 0 1 5	1	T	S 0 1 S 0 2 T 0 3	
6 8	P 0 1 6	1	T	S 0 1 S 0 2 T 0 3	
6 9	P 0 1 7	1	T	S 0 1 S 0 2 T 0 3	
7 0	P 0 1 8	1	T	S 0 1 S 0 2 T 0 3	
7 1	P 0 2 0	1	T	S 0 1 S 0 2 T 0 3	
7 2	P 0 2 1	1	T	S 0 1 S 0 2 T 0 3	
7 3	P 0 2 2	1	T	S 0 1 S 0 2 T 0 3	
7 4	P 0 2 3	1	T	S 0 1 S 0 2 T 0 3	
7 5	P 0 2 4	1	T	S 0 1 S 0 2 T 0 3	
7 6	P 0 2 6	1	T	S 0 1 S 0 2 T 0 3	
7 7	P 0 2 7	1	T	S 0 1 S 0 2 T 0 3	
7 8	P 0 2 8	1	T	S 0 1 S 0 2 T 0 3	
7 9	P 0 2 9	1	T	S 0 1 S 0 2 T 0 3	
8 0	P 0 3 0	20	T	S 0 1 S 0 2 T 0 3	
8 1	P 0 3 1	10	T	S 0 1 S 0 2 T 0 3	
2	P 0 3 3	20	T	S 0 1 S 0 2 T 0 3	
	P 0 3 4	1	T	S 0 1 S 0 2 T 0 3	
4	P 0 3 6	1	T	S 0 1 S 0 2 T 0 3	
5	P 0 3 7	1	T	S 0 1 S 0 2 T 0 3	
6	P 0 3 8	1	T	S 0 1 S 0 2 T 0 3	
7	P 0 3 9	1	T	S 0 1 S 0 2 T 0 3	
8	P 0 4 0	1	T	S 0 1 S 0 2 T 0 3	
9	P 0 4 1	1	T	S 0 1 S 0 2 T 0 3	
0	P 0 4 2	1	T	S 0 1 S 0 2 T 0 3	
1	P 0 4 3	1	T	S 0 1 S 0 2 T 0 3	
2	P 0 4 4	1	T	S 0 1 S 0 2 T 0 3	
3	P 0 4 5	1	T	S 0 1 S 0 2 T 0 3	
4	P 0 4 6	1	T	S 0 1 S 0 2 T 0 3	
5	P 0 4 7	1	T	S 0 1 S 0 2 T 0 3	
6	P 0 4 8	1	T	S 0 1 S 0 2 T 0 3	
7	P 0 4 9	1	T	S 0 1 S 0 2 T 0 3	
8	P 0 5 0	1	T	S 0 1 S 0 2 T 0 3	
9	P 0 5 1	1	T	S 0 1 S 0 2 T 0 3	

cription of Hazardous Wastes (*Continued; Additional Sheet*)

ine mber	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
30	P054	1	T	S01 S02 T03	
31	P056	1	T	S01 S02 T03	
32	P057	1	T	S01 S02 T03	
33	P058	1	T	S01 S02 T03	
34	P059	1	T	S01 S02 T03	
35	P060	1	T	S01 S02 T03	
36	P062	1	T	S01 S02 T03	
37	P063	1	T	S01 S02 T03	
38	P064	1	T	S01 S02 T03	
39	P065	1	T	S01 S02 T03	
40	P066	1	T	S01 S02 T03	
41	P067	1	T	S01 S02 T03	
42	P068	1	T	S01 S02 T03	
43	P069	20	T	S01 S02 T03	
44	P070	10	T	S01 S02 T03	
	P071	10	T	S01 S02 T03	
	P072	1	T	S01 S02 T03	
47	P073	1	T	S01 S02 T03	
48	P074	1	T	S01	
49	P075	1	T	S01 S02 T03	
50	P076	1	T	S01 S02 T03	
51	P077	1	T	S01 S02 T03	
52	P078	1	T	S01 S02 T03	
53	P081	1	T	S01 S02 T03	
54	P082	1	T	S01 S02 T03	
55	P084	1	T	S01 S02 T03	
56	P085	1	T	S01 S02 T03	
57	P087	1	T	S01 S02 T03	
58	P088	1	T	S01 S02 T03	
59	P089	1	T	S01 S02 T03	
60	P092	1	T	S01 S02 T03	
61	P093	1	T	S01 S02 T03	
62	P094	1	T	S01 S02 T03	

cription of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
33	P095	1	T	S01 S02 T03	
34	P096	1	T	S01 S02 T03	
35	P097	1	T	S01 S02 T03	
36	P098	1	T	S01 S02 T03	
37	P099	1	T	S01	
38	P101	1	T	S01 S02 T03	
39	P102	1	T	S01 S02 T03	
40	P103	1	T	S01 S02 T03	
41	P104	1	T	S01	
42	P105	1	T	S01 S02 T03	
43	P106	1	T	S01 S02 T03	
44	P108	1	T	S01 S02 T03	
45	P109	1	T	S01 S02 T03	
46	P110	1	T	S01 S02 T03	
47	P111	1	T	S01 S02 T03	
	P112	1	T	S01 S02 T03	
	P113	1	T	S01	
50	P114	1	T	S01	
51	P115	1	T	S01	
52	P116	1	T	S01 S02 T03	
53	P118	1	T	S01 S02 T03	
54	P119	1	T	S01	
55	P120	1	T	S01	
56	P121	1	T	S01	
57	P122	1	T	S01 S02 T03	
58	P123	1	T	S01 S02 T03	
59	P127	1	T	S01 S02 T03	
60	P128	1	T	S01 S02 T03	
61	P185	1	T	S01 S02 T03	
62	P188	1	T	S01 S02 T03	
63	P189	1	T	S01 S02 T03	
64	P190	1	T	S01 S02 T03	
65	P191	1	T	S01 S02 T03	

cription of Hazardous Wastes (*Continued; Additional Sheet*)

ne nber	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
96	P192	1	T	S01 S02 T03	
97	P194	1	T	S01 S02 T03	
98	P196	1	T	S01 S02 T03	
99	P197	1	T	S01 S02 T03	
00	P198	1	T	S01 S02 T03	
01	P199	1	T	S01 S02 T03	
02	P201	1	T	S01 S02 T03	
03	P202	1	T	S01 S02 T03	
04	P203	1	T	S01 S02 T03	
05	P204	1	T	S01 S02 T03	
06	P205	1	T	S01 S02 T03	
07	U001	1	T	S01 S02 T03	
08	U002	1	T	S01 S02 T03	
09	U003	1	T	S01 S02 T03	
10	U004	1	T	S01 S02 T03	
	U005	1	T	S01 S02 T03	
	U006	1	T	S01 S02 T03	
13	U007	1	T	S01 S02 T03	
14	U008	1	T	S01 S02 T03	
15	U009	1	T	S01 S02 T03	
16	U010	1	T	S01 S02 T03	
17	U011	1	T	S01 S02 T03	
18	U012	1	T	S01 S02 T03	
19	U014	1	T	S01 S02 T03	
20	U015	1	T	S01 S02 T03	
21	U016	1	T	S01 S02 T03	
22	U017	1	T	S01 S02 T03	
23	U018	1	T	S01 S02 T03	
24	U019	1	T	S01 S02 T03	
25	U020	1	T	S01 S02 T03	
26	U021	1	T	S01 S02 T03	
27	U022	1	T	S01 S02 T03	
28	U023	1	T	S01 S02 T03	

10. Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
199	U 0 2 4	1	T	S 0 1 S 0 2 T 0 3	
200	U 0 2 5	1	T	S 0 1 S 0 2 T 0 3	
201	U 0 2 6	1	T	S 0 1 S 0 2 T 0 3	
202	U 0 2 7	1	T	S 0 1 S 0 2 T 0 3	
203	U 0 2 8	1	T	S 0 1 S 0 2 T 0 3	
204	U 0 2 9	1	T	S 0 1 S 0 2 T 0 3	
205	U 0 3 0	1	T	S 0 1 S 0 2 T 0 3	
206	U 0 3 1	1	T	S 0 1 S 0 2 T 0 3	
207	U 0 3 2	1	T	S 0 1	
208	U 0 3 3	1	T	S 0 1 S 0 2 T 0 3	
209	U 0 3 4	1	T	S 0 1 S 0 2 T 0 3	
210	U 0 3 5	1	T	S 0 1 S 0 2 T 0 3	
211	U 0 3 6	1	T	S 0 1 S 0 2 T 0 3	
212	U 0 3 7	1	T	S 0 1 S 0 2 T 0 3	
213	U 0 3 8	1	T	S 0 1 S 0 2 T 0 3	
214	U 0 3 9	1	T	S 0 1 S 0 2 T 0 3	
[redacted]	U 0 4 1	1	T	S 0 1 S 0 2 T 0 3	
[redacted]	U 0 4 2	1	T	S 0 1 S 0 2 T 0 3	
217	U 0 4 3	1	T	S 0 1 S 0 2 T 0 3	
218	U 0 4 4	1	T	S 0 1 S 0 2 T 0 3	
219	U 0 4 5	1	T	S 0 1 S 0 2 T 0 3	
220	U 0 4 6	1	T	S 0 1 S 0 2 T 0 3	
221	U 0 4 7	1	T	S 0 1 S 0 2 T 0 3	
222	U 0 4 8	1	T	S 0 1 S 0 2 T 0 3	
223	U 0 4 9	1	T	S 0 1 S 0 2 T 0 3	
224	U 0 5 0	1	T	S 0 1 S 0 2 T 0 3	
225	U 0 5 1	1	T	S 0 1 S 0 2 T 0 3	
226	U 0 5 2	1	T	S 0 1 S 0 2 T 0 3	
227	U 0 5 3	1	T	S 0 1 S 0 2 T 0 3	
228	U 0 5 5	1	T	S 0 1 S 0 2 T 0 3	
229	U 0 5 6	1	T	S 0 1 S 0 2 T 0 3	
230	U 0 5 7	1	T	S 0 1 S 0 2 T 0 3	

scription of Hazardous Wastes (Continued; Additional Sheet)

Line umber	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
232	U058	1	T	S01 S02 T03	
233	U059	1	T	S01 S02 T03	
234	U060	1	T	S01 S02 T03	
235	U061	1	T	S01 S02 T03	
236	U062	1	T	S01 S02 T03	
237	U063	1	T	S01 S02 T03	
238	U064	1	T	S01 S02 T03	
239	U066	1	T	S01 S02 T03	
240	U067	1	T	S01 S02 T03	
241	U068	1	T	S01 S02 T03	
242	U069	1	T	S01 S02 T03	
243	U070	1	T	S01 S02 T03	
244	U071	1	T	S01 S02 T03	
245	U072	1	T	S01 S02 T03	
246	U073	1	T	S01 S02 T03	
247	U074	1	T	S01 S02 T03	
[redacted]	U075	1	T	S01 S02 T03	
[redacted]	U076	1	T	S01 S02 T03	
250	U077	1	T	S01 S02 T03	
251	U078	1	T	S01 S02 T03	
252	U079	1	T	S01 S02 T03	
253	U080	50	T	S01 S02 T03	
254	U081	1	T	S01 S02 T03	
255	U082	1	T	S01 S02 T03	
256	U083	1	T	S01 S02 T03	
257	U084	1	T	S01 S02 T03	
258	U085	1	T	S01 S02 T03	
259	U086	1	T	S01 S02 T03	
260	U087	1	T	S01 S02 T03	
261	U088	1	T	S01 S02 T03	
262	U089	1	T	S01 S02 T03	
263	U090	1	T	S01 S02 T03	
264	U091	1	T	S01 S02 T03	

cription of Hazardous Wastes (*Continued; Additional Sheet*)

ine mber	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)									(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
265	U092	1	T	S	0	1	S	0	2	T	0	3	
266	U093	1	T	S	0	1	S	0	2	T	0	3	
267	U094	1	T	S	0	1	S	0	2	T	0	3	
268	U095	1	T	S	0	1	S	0	2	T	0	3	
269	U096	1	T	S	0	1	S	0	2	T	0	3	
270	U097	1	T	S	0	1	S	0	2	T	0	3	
271	U098	1	T	S	0	1	S	0	2	T	0	3	
272	U099	1	T	S	0	1	S	0	2	T	0	3	
273	U101	1	T	S	0	1	S	0	2	T	0	3	
274	U102	1	T	S	0	1	S	0	2	T	0	3	
275	U103	1	T	S	0	1	S	0	2	T	0	3	
276	U105	1	T	S	0	1	S	0	2	T	0	3	
277	U106	1	T	S	0	1	S	0	2	T	0	3	
278	U107	1	T	S	0	1	S	0	2	T	0	3	
279	U108	1	T	S	0	1	S	0	2	T	0	3	
?	U109	1	T	S	0	1	S	0	2	T	0	3	
[redacted]	U110	1	T	S	0	1	S	0	2	T	0	3	
282	U111	1	T	S	0	1	S	0	2	T	0	3	
283	U112	1	T	S	0	1	S	0	2	T	0	3	
284	U113	1	T	S	0	1	S	0	2	T	0	3	
285	U114	1	T	S	0	1	S	0	2	T	0	3	
286	U115	1	T	S	0	1	S	0	2	T	0	3	
287	U116	1	T	S	0	1	S	0	2	T	0	3	
288	U117	1	T	S	0	1	S	0	2	T	0	3	
289	U118	1	T	S	0	1	S	0	2	T	0	3	
290	U119	1	T	S	0	1	S	0	2	T	0	3	
291	U120	1	T	S	0	1	S	0	2	T	0	3	
292	U121	1	T	S	0	1	S	0	2	T	0	3	
293	U122	1	T	S	0	1	S	0	2	T	0	3	
294	U123	1	T	S	0	1	S	0	2	T	0	3	
295	U124	1	T	S	0	1	S	0	2	T	0	3	
296	U125	1	T	S	0	1	S	0	2	T	0	3	
297	U126	1	T	S	0	1	S	0	2	T	0	3	

Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
298	U127	1	T	S01 S02 T03	
299	U128	1	T	S01 S02 T03	
300	U129	1	T	S01 S02 T03	
301	U130	1	T	S01 S02 T03	
302	U131	1	T	S01 S02 T03	
303	U132	1	T	S01 S02 T03	
304	U133	1	T	S01 S02 T03	
305	U134	1	T	S01 S02 T03	
306	U135	1	T	S01 S02 T03	
307	U136	1	T	S01 S02 T03	
308	U137	1	T	S01 S02 T03	
309	U138	1	T	S01 S02 T03	
310	U140	1	T	S01 S02 T03	
311	U141	1	T	S01 S02 T03	
312	U142	1	T	S01 S02 T03	
313	U143	1	T	S01 S02 T03	
[illegible]	U144	1	T	S01 S02 T03	
[illegible]	U145	1	T	S01	
316	U146	1	T	S01 S02 T03	
317	U147	1	T	S01 S02 T03	
318	U148	1	T	S01 S02 T03	
319	U149	1	T	S01 S02 T03	
320	U150	1	T	S01 S02 T03	
321	U151	1	T	S01	
322	U152	1	T	S01 S02 T03	
323	U153	1	T	S01 S02 T03	
324	U154	100	T	S01 S02 T03	
325	U155	1	T	S01 S02 T03	
326	U156	1	T	S01 S02 T03	
327	U157	1	T	S01 S02 T03	
328	U158	1	T	S01 S02 T03	
329	U159	10	T	S01 S02 T03	
330	U160	1	T	S01 S02 T03	

Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
331	U161	1	T	S01 S02 T03	
332	U162	1	T	S01 S02 T03	
333	U163	1	T	S01 S02 T03	
334	U164	1	T	S01 S02 T03	
335	U165	1	T	S01 S02 T03	
336	U166	1	T	S01 S02 T03	
337	U167	1	T	S01 S02 T03	
338	U168	1	T	S01 S02 T03	
339	U169	1	T	S01 S02 T03	
340	U170	1	T	S01 S02 T03	
341	U171	1	T	S01 S02 T03	
342	U172	1	T	S01 S02 T03	
343	U173	1	T	S01 S02 T03	
344	U174	1	T	S01 S02 T03	
345	U176	1	T	S01 S02 T03	
346	U177	1	T	S01 S02 T03	
347	U178	1	T	S01 S02 T03	
348	U179	1	T	S01 S02 T03	
349	U180	1	T	S01 S02 T03	
350	U181	1	T	S01 S02 T03	
351	U182	1	T	S01 S02 T03	
352	U183	1	T	S01 S02 T03	
353	U184	1	T	S01 S02 T03	
354	U185	1	T	S01 S02 T03	
355	U186	1	T	S01 S02 T03	
356	U187	1	T	S01 S02 T03	
357	U188	2	T	S01 S02 T03	
358	U189	1	T	S01 S02 T03	
359	U190	1	T	S01 S02 T03	
360	U191	1	T	S01 S02 T03	
361	U192	1	T	S01 S02 T03	
362	U193	1	T	S01 S02 T03	
363	U194	1	T	S01 S02 T03	

Description of Hazardous Wastes (Continued; Additional Sheet)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
364	U196	1	T	S01 S02 T03	
365	U197	1	T	S01 S02 T03	
366	U200	1	T	S01 S02 T03	
367	U201	1	T	S01 S02 T03	
368	U202	1	T	S01 S02 T03	
369	U203	1	T	S01 S02 T03	
370	U204	1	T	S01	
371	U205	1	T	S01	
372	U206	1	T	S01 S02 T03	
373	U207	1	T	S01 S02 T03	
374	U208	1	T	S01 S02 T03	
375	U209	1	T	S01 S02 T03	
376	U210	1	T	S01 S02 T03	
377	U211	100	T	S01 S02 T03	
378	U213	1	T	S01 S02 T03	
379	U214	1	T	S01 S02 T03	
[illegible]	U215	1	T	S01 S02 T03	
[illegible]	U216	1	T	S01	
382	U217	1	T	S01	
383	U218	1	T	S01 S02 T03	
384	U219	1	T	S01 S02 T03	
385	U220	100	T	S01 S02 T03	
386	U221	1	T	S01 S02 T03	
387	U222	1	T	S01 S02 T03	
388	U223	1	T	S01 S02 T03	
389	U225	1	T	S01 S02 T03	
390	U226	1	T	S01 S02 T03	
391	U227	1	T	S01 S02 T03	
392	U228	1	T	S01 S02 T03	
393	U234	1	T	S01 S02 T03	
394	U235	1	T	S01 S02 T03	
395	U236	1	T	S01 S02 T03	
396	U237	1	T	S01 S02 T03	

Description of Hazardous Wastes (*Continued; Additional Sheet*)

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES (1) PROCESS CODES (Enter code)	(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
397	U238	1	T	S01 S02 T03	
398	U239	10	T	S01 S02 T03	
399	U240	10	T	S01 S02 T03	
400	U243	1	T	S01 S02 T03	
401	U244	1	T	S01 S02 T03	
402	U246	1	T	S01 S02 T03	
403	U247	1	T	S01 S02 T03	
404	U248	1	T	S01 S02 T03	
405	U249	1	T	S01 S02 T03	
406	U271	10	T	S01 S02 T03	
407	U278	1	T	S01 S02 T03	
408	U279	1	T	S01 S02 T03	
409	U280	1	T	S01 S02 T03	
410	U328	10	T	S01 S02 T03	
411	U353	1	T	S01 S02 T03	
412	U359	1	T	S01 S02 T03	
413	U364	1	T	S01 S02 T03	
414	U367	1	T	S01 S02 T03	
415	U372	1	T	S01 S02 T03	
416	U373	1	T	S01 S02 T03	
417	U387	1	T	S01 S02 T03	
418	U389	1	T	S01 S02 T03	
419	U394	1	T	S01 S02 T03	
420	U395	1	T	S01 S02 T03	
421	U404	1	T	S01 S02 T03	
422	U409	1	T	S01 S02 T03	
423	U410	1	T	S01 S02 T03	
424	U411	1	T	S01 S02 T03	

11. Map (See instructions on page 38) SEE ATTACHED

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

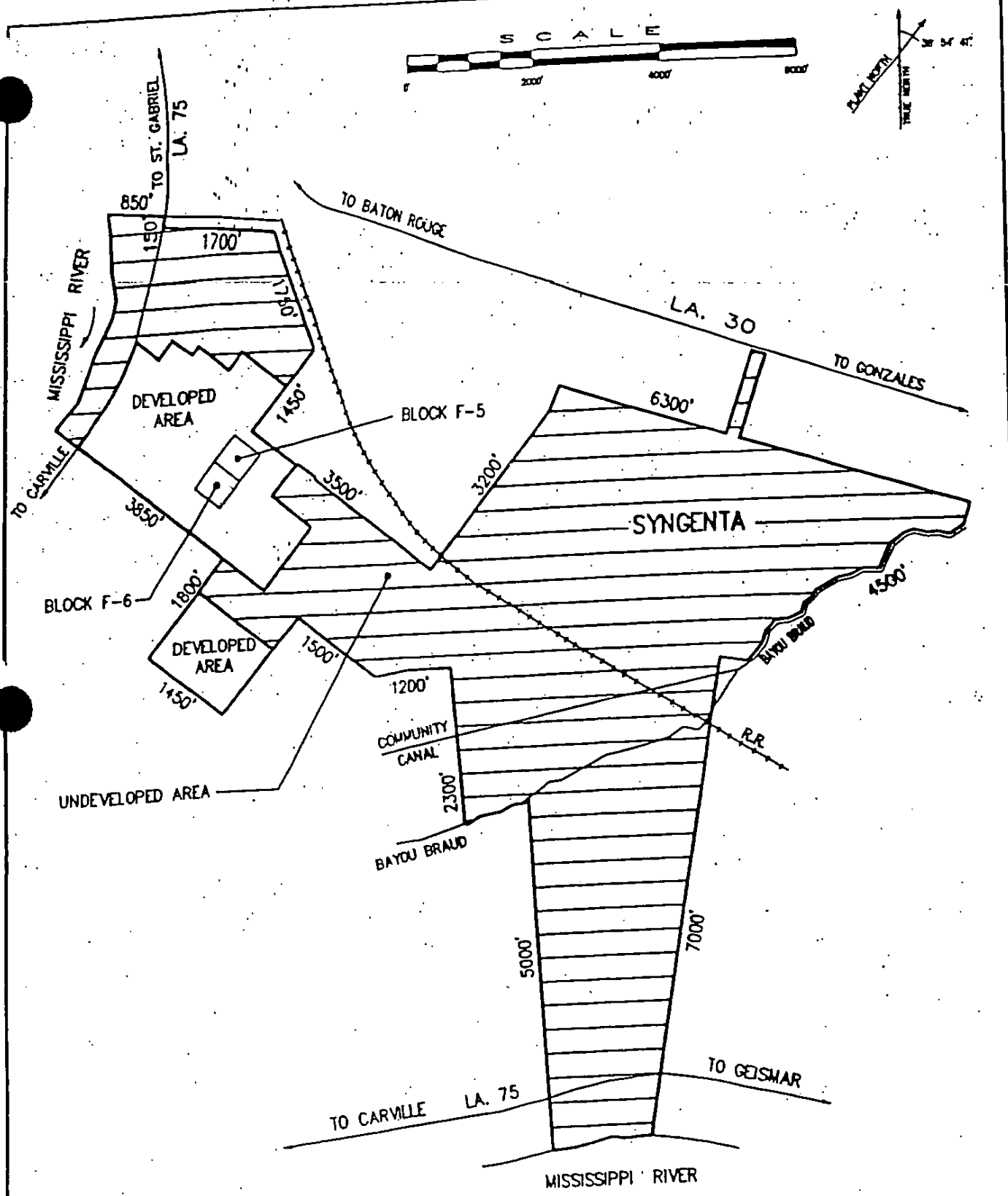
12. Facility Drawing (See instructions on page 39) SEE ATTACHED

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 39) SEE ATTACHED

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

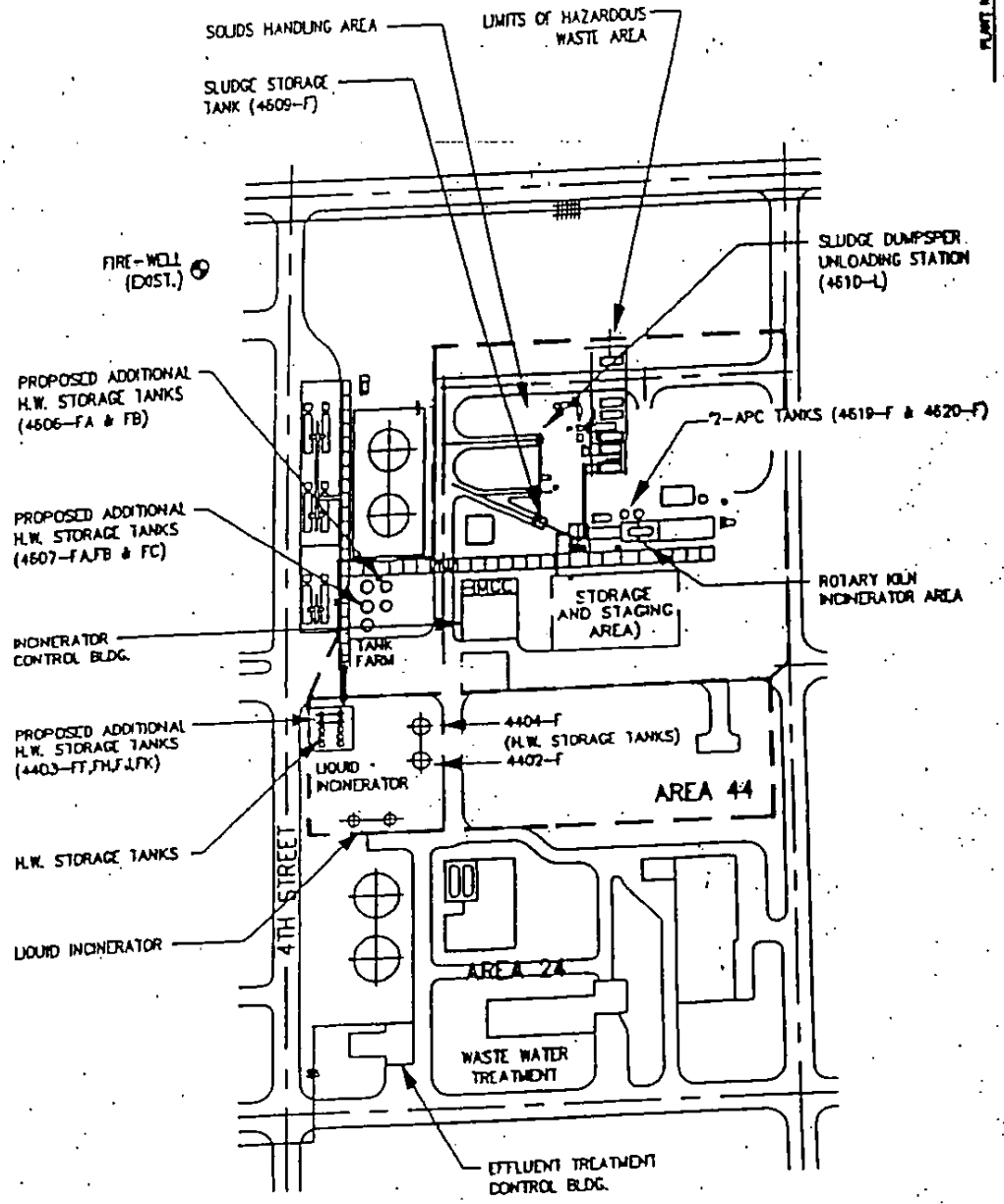
14. Comments (See instructions on page 39)



SYNGENTA

LOUISIANA

HAZARDOUS WASTE MANAGEMENT FACILITIES



STORAGE TANKS FULL CAPACITIES

EXISTING

4403-FA,FG,FE (24,500 GAL EA.)
4402-F (18,500 GAL.)
4403-FB,FC,FD (23,500 GAL EA.)
4404-F (16,000 GAL.)
4604-F (3,000 GAL.)
4609-F (34,500 GAL.)
4620-F (3,500 GAL.)
[illegible]-F (3,500 GAL.)

PLANNED ADDITIONAL TANKS

4403-FT,FH,FJ,FK (24,500 GAL EA.)
4406-FA,FB (10,000 GAL.)
4607-FA,FB,FC (15,000 GAL EA.)

SYNGENTA

LOUISIANA

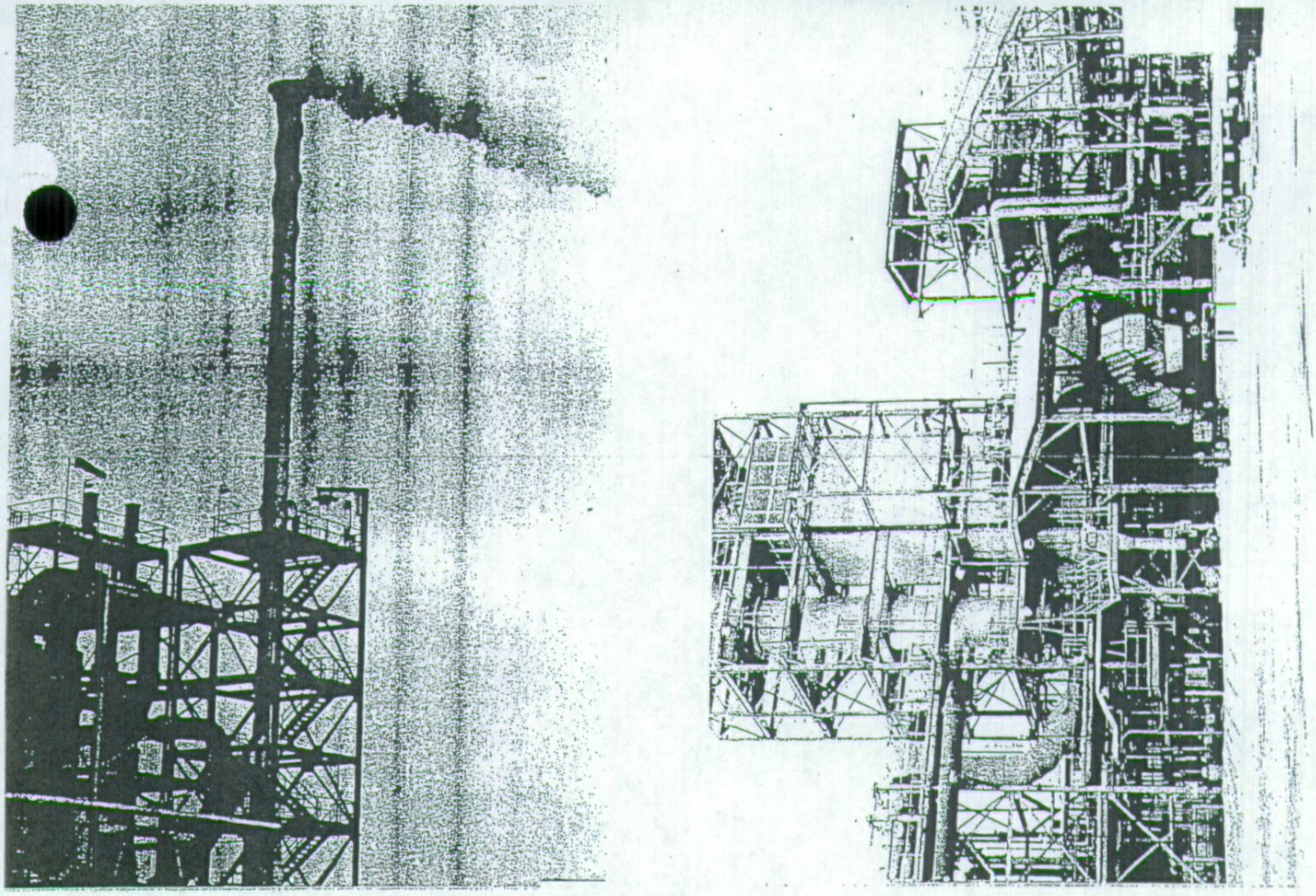
[illegible] CARRIER

MISC1\EPA

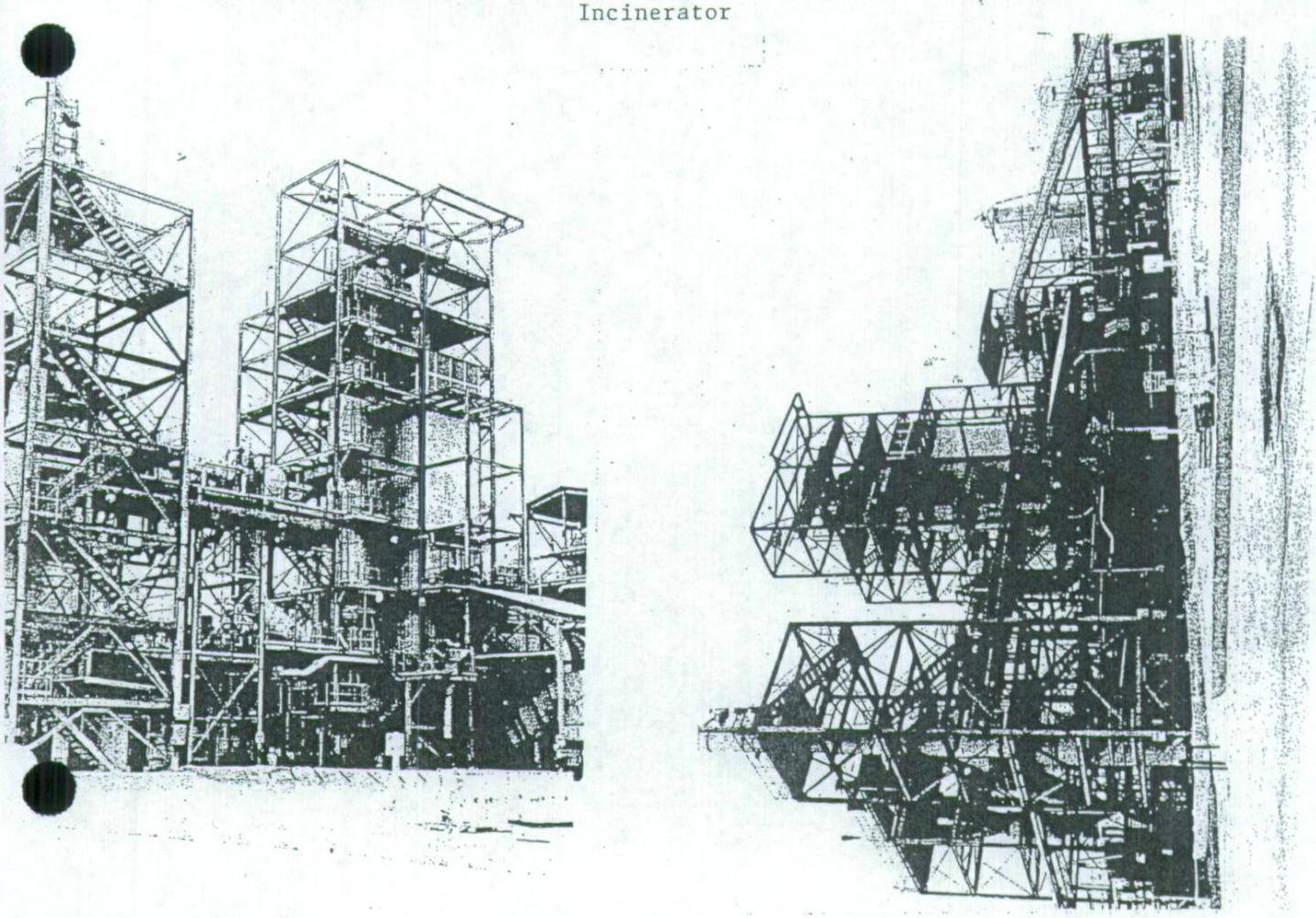
13. PHOTOGRAPHS

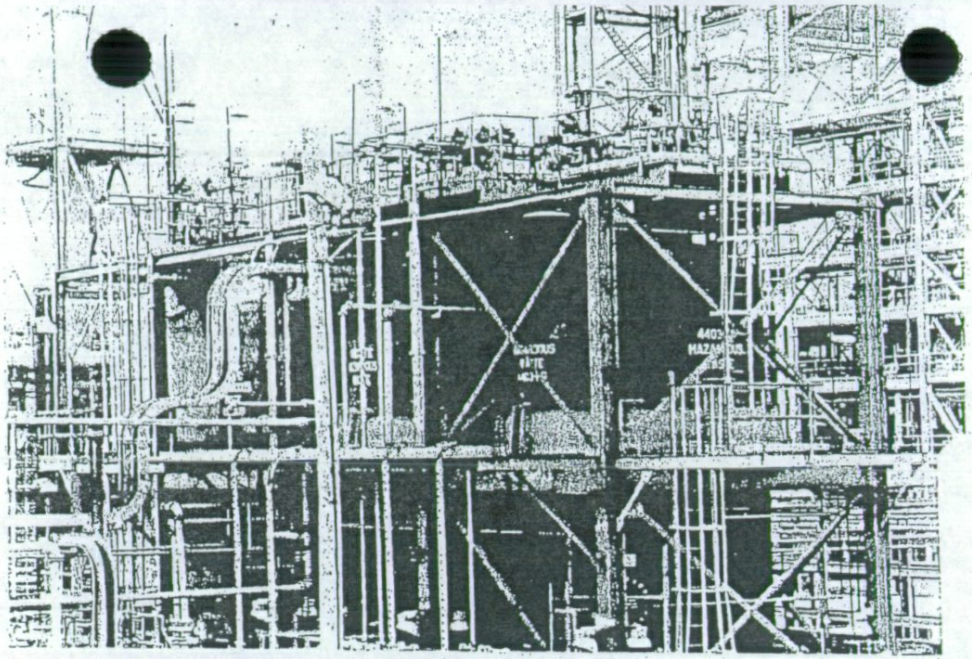
The photographs of the facilities were previously submitted to LDEQ on April 11, 1995, and again utilized in a March 4, 1996 resubmittal. The facilities have not changed since the April 11, 1995 submittal except for replacement of 4402-F storage tank with an above ground stainless steel tank. An updated picture of 4402-F was taken in August 2004 and included herein. Copies of the photographs are being submitted with this updated Part A Hazardous Waste Permit Application.

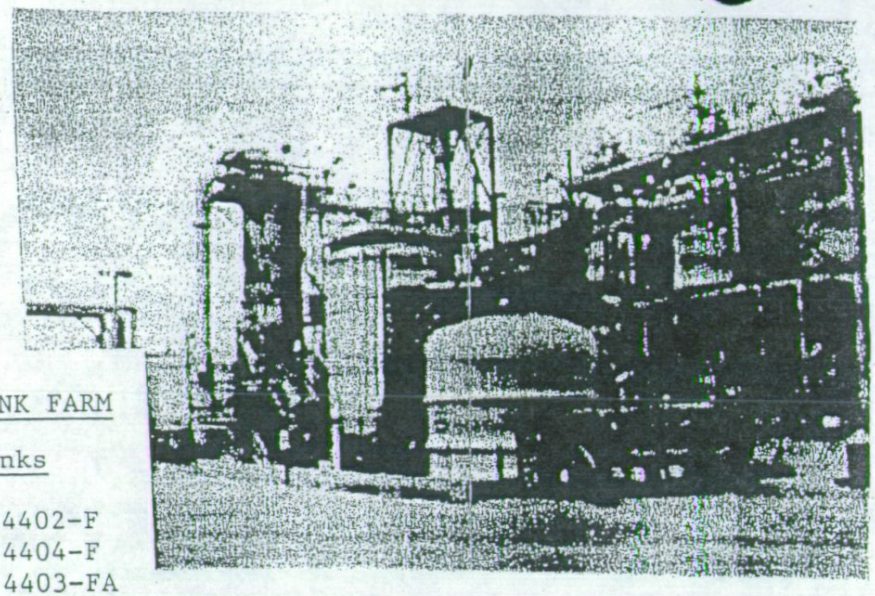
BEST COPY OF THE NEXT 18 PAGES



Multi-Purpose
Incinerator



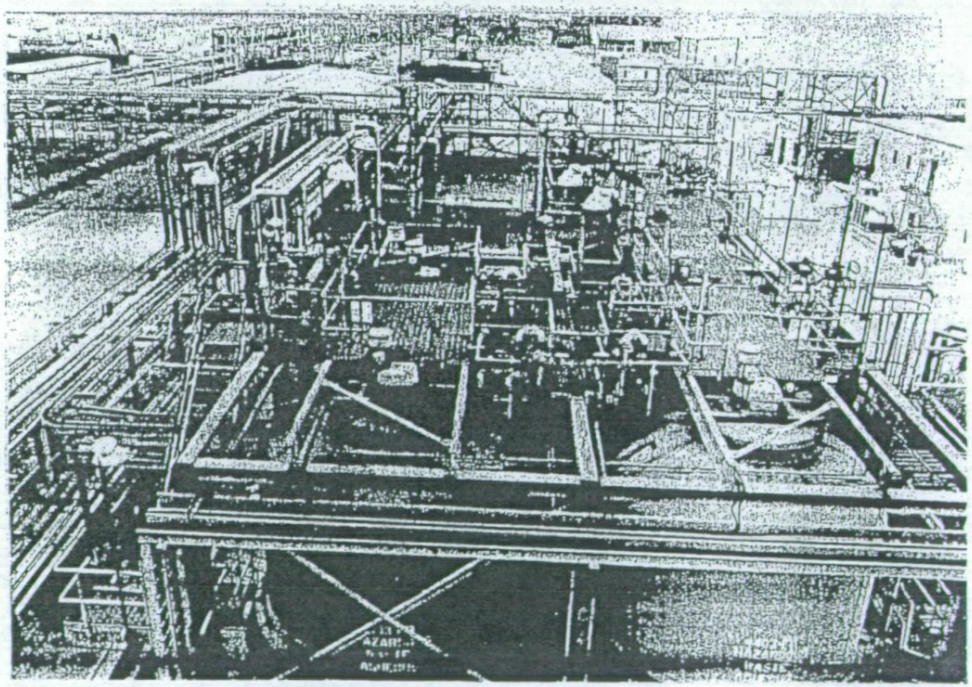


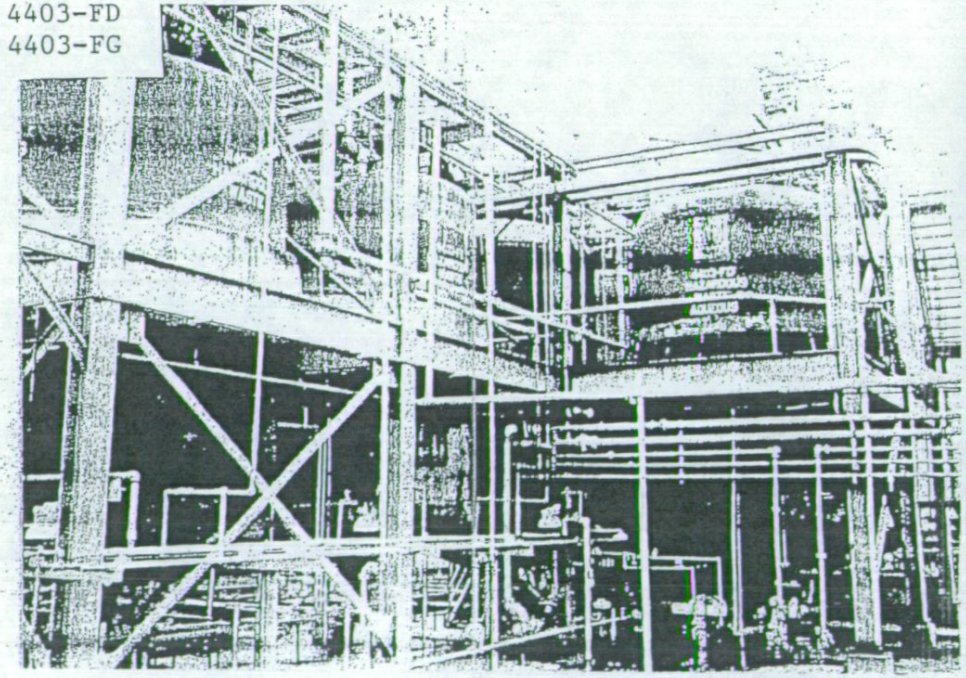


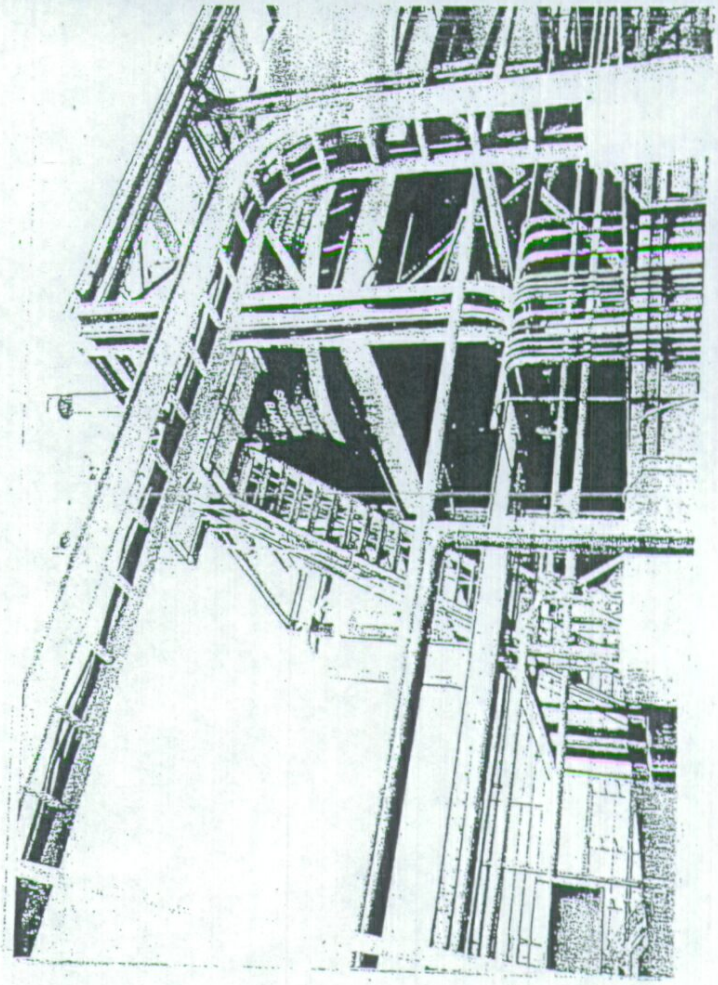
TANK FARM

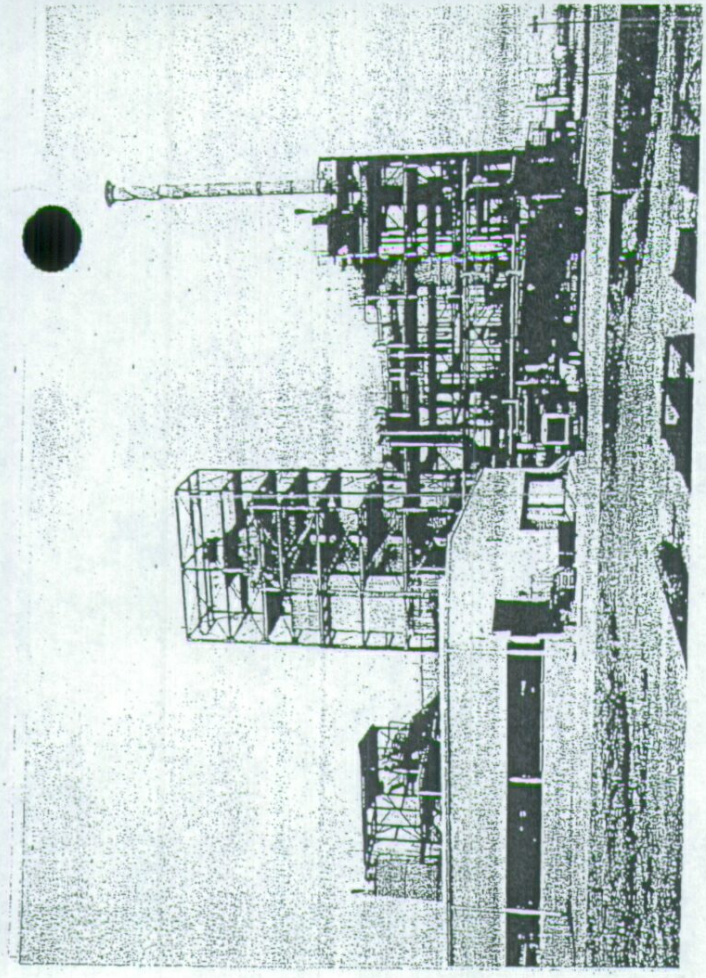
Tanks

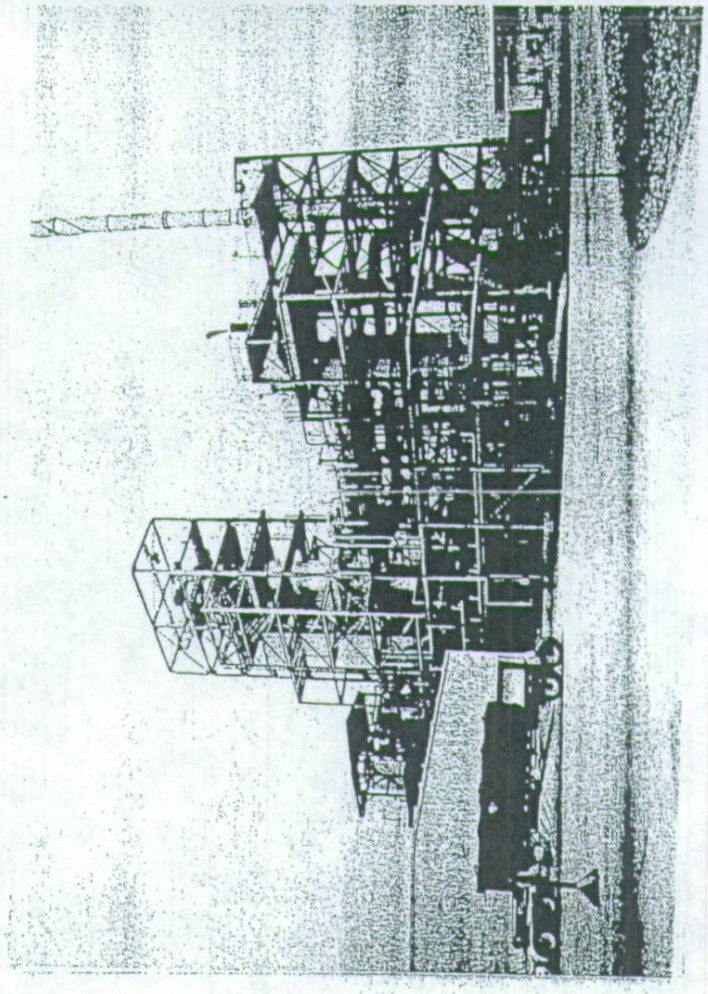
4402-F
4404-F
4403-FA
4403-FE
4403-FB
4403-FC
4403-FD
4403-FG

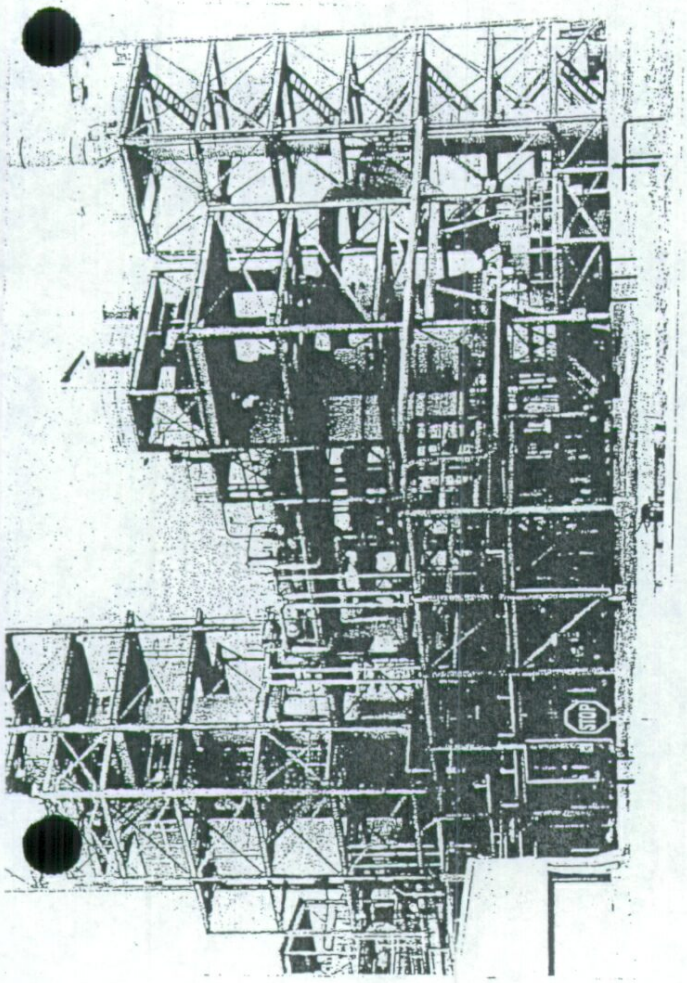


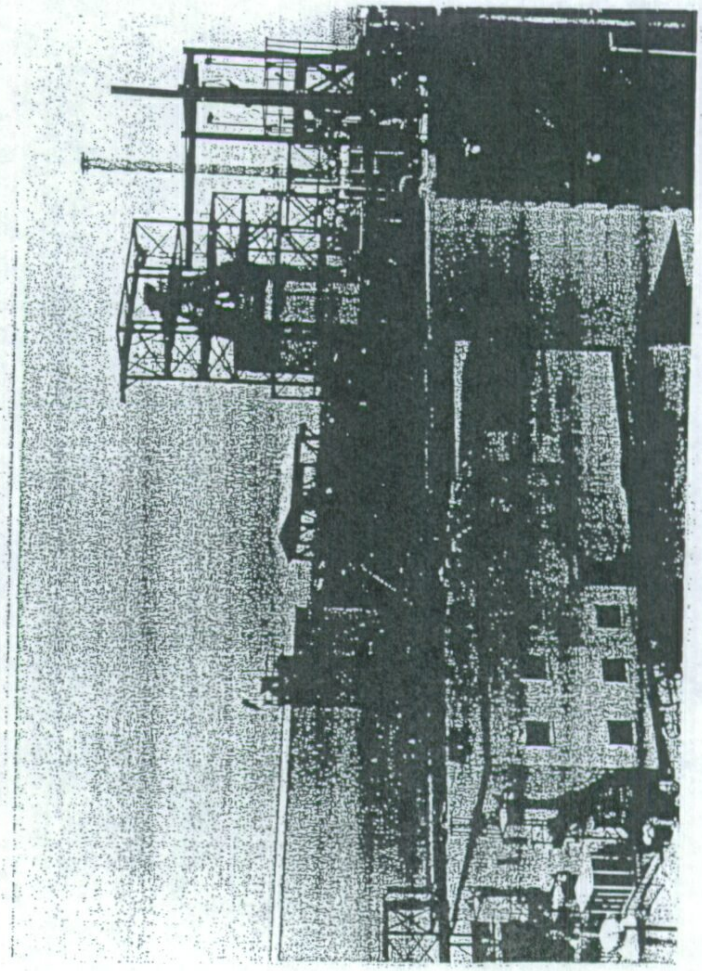


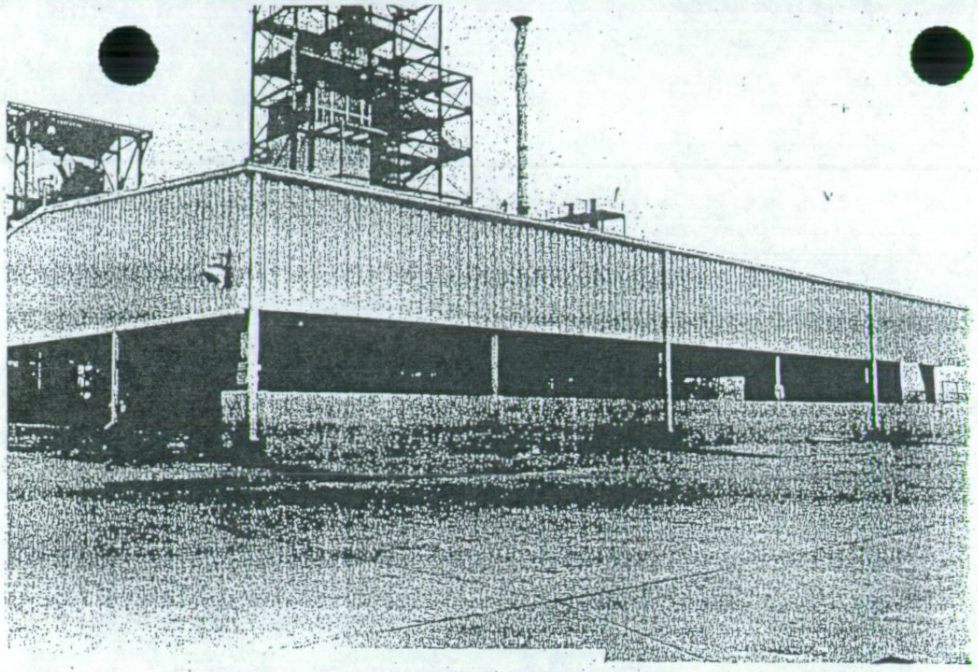




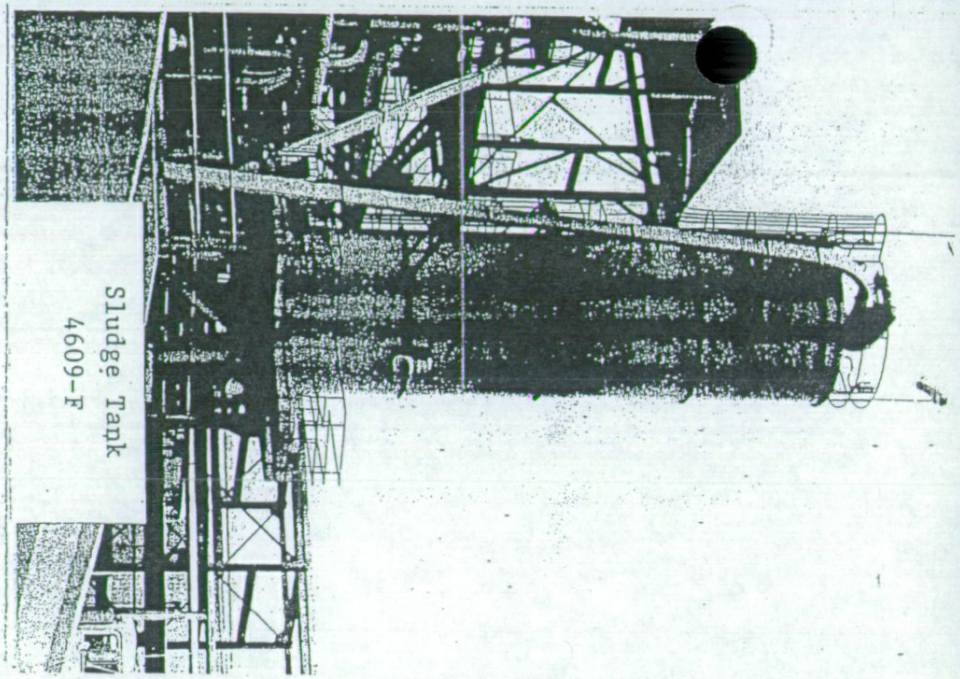




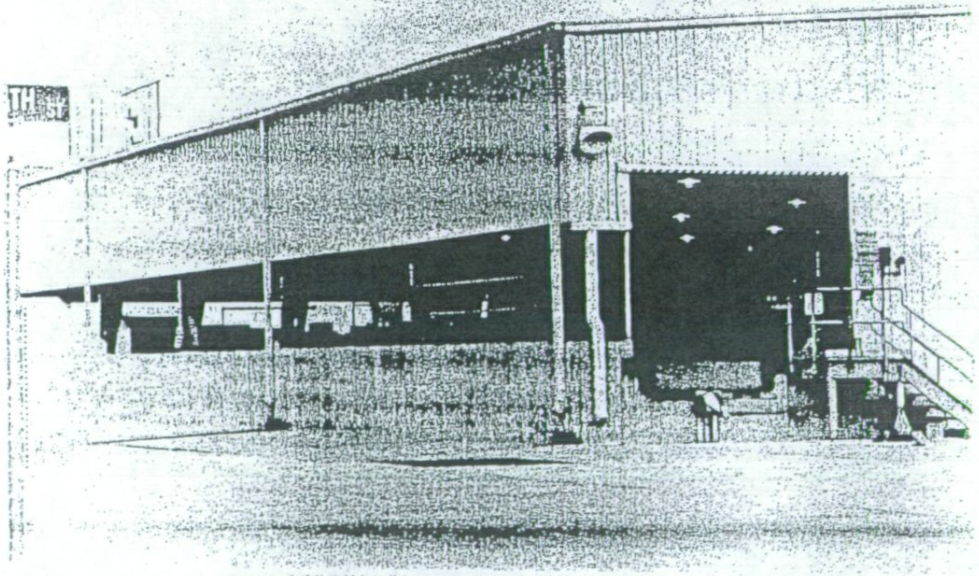


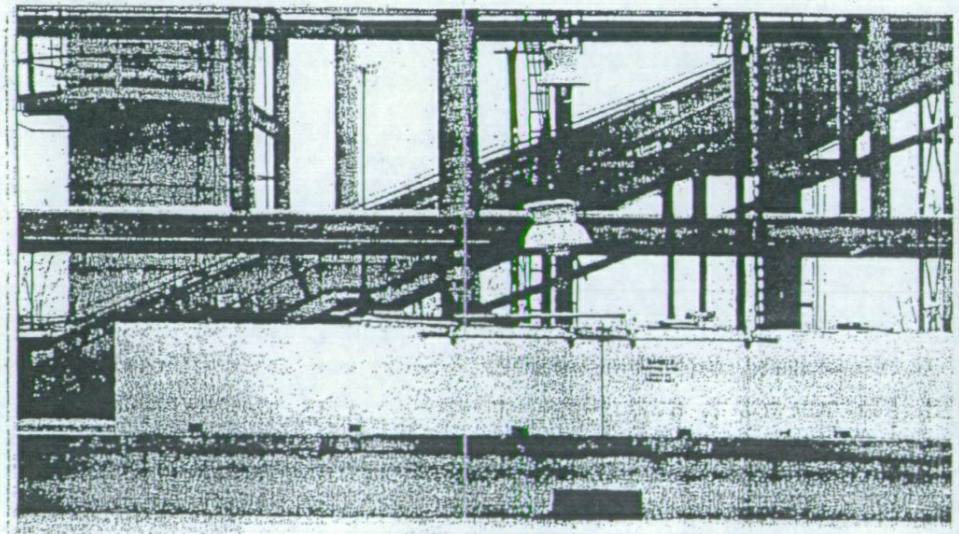


Container Storage Area

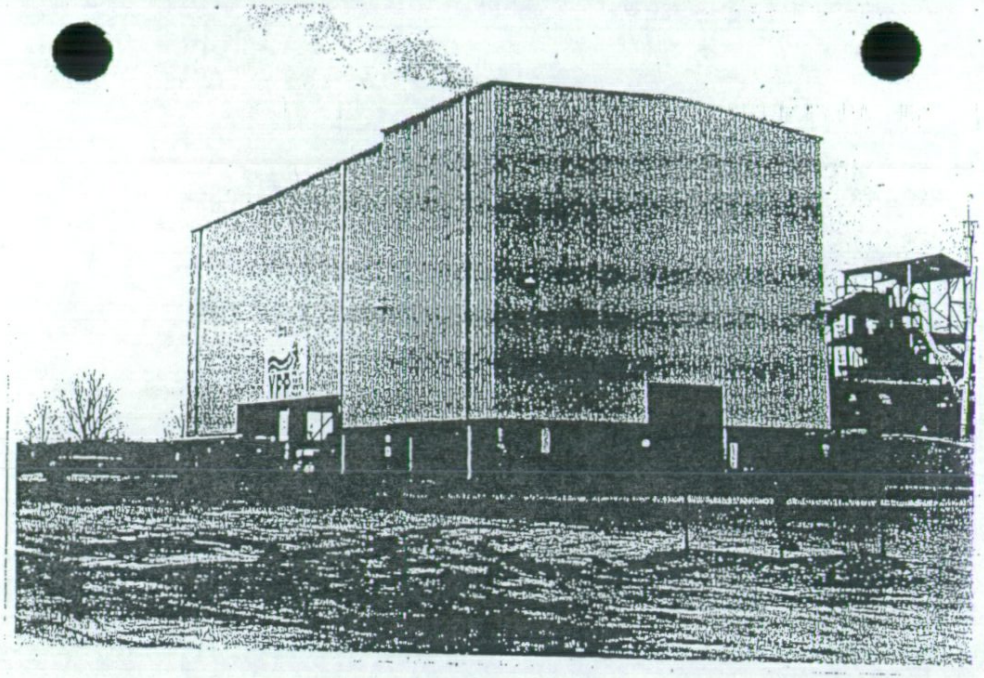


Sludge Tank
4609-F

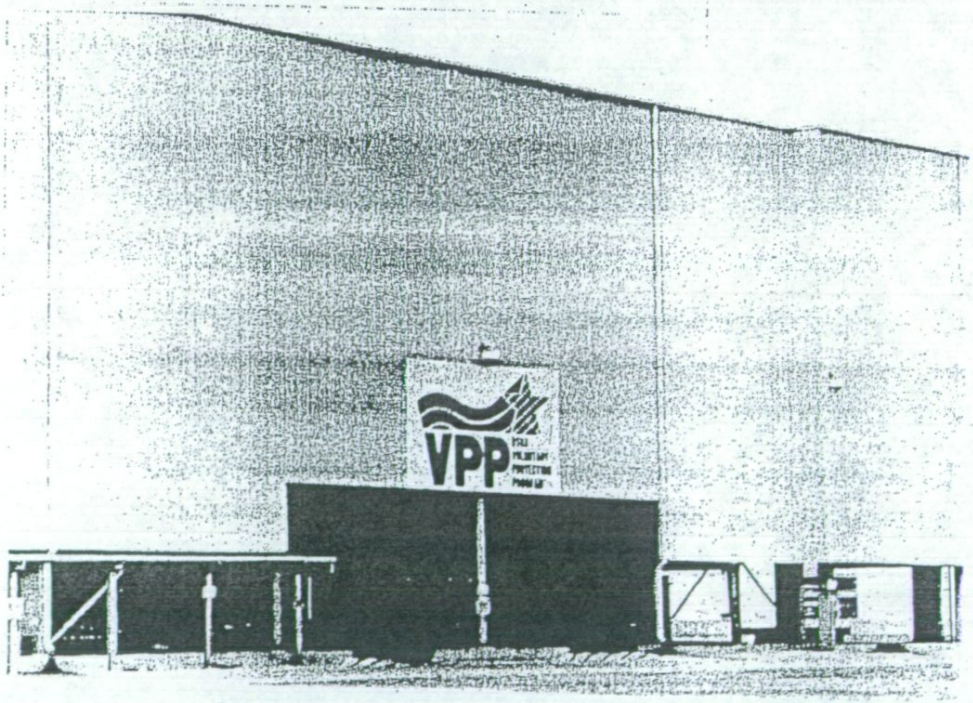


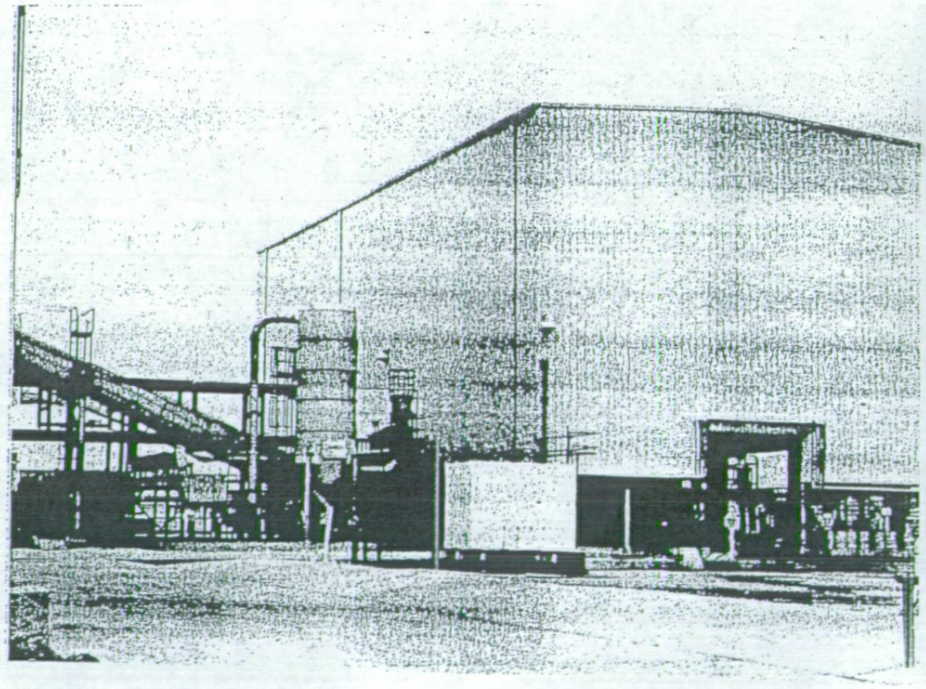


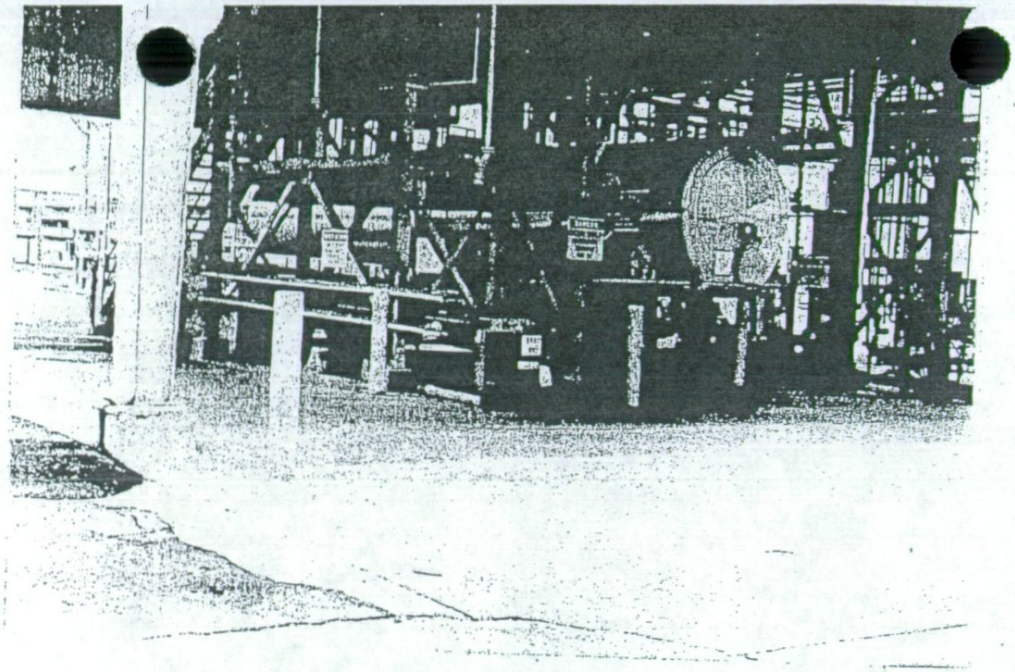
Bulk Solid/Sludge Storage
4604-F

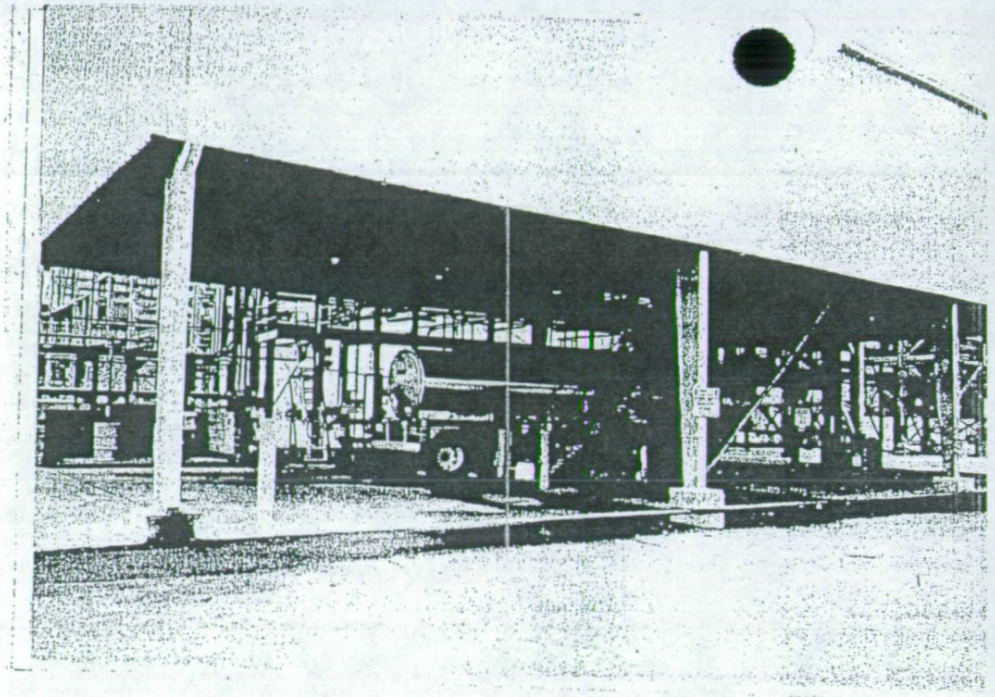


Solids Shredding Facility

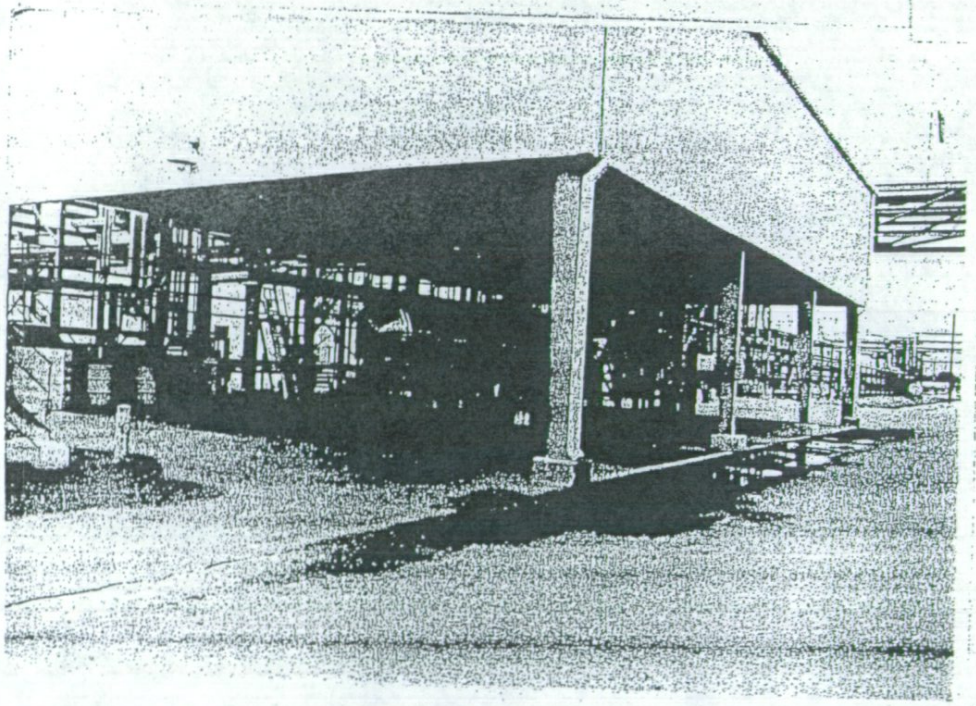


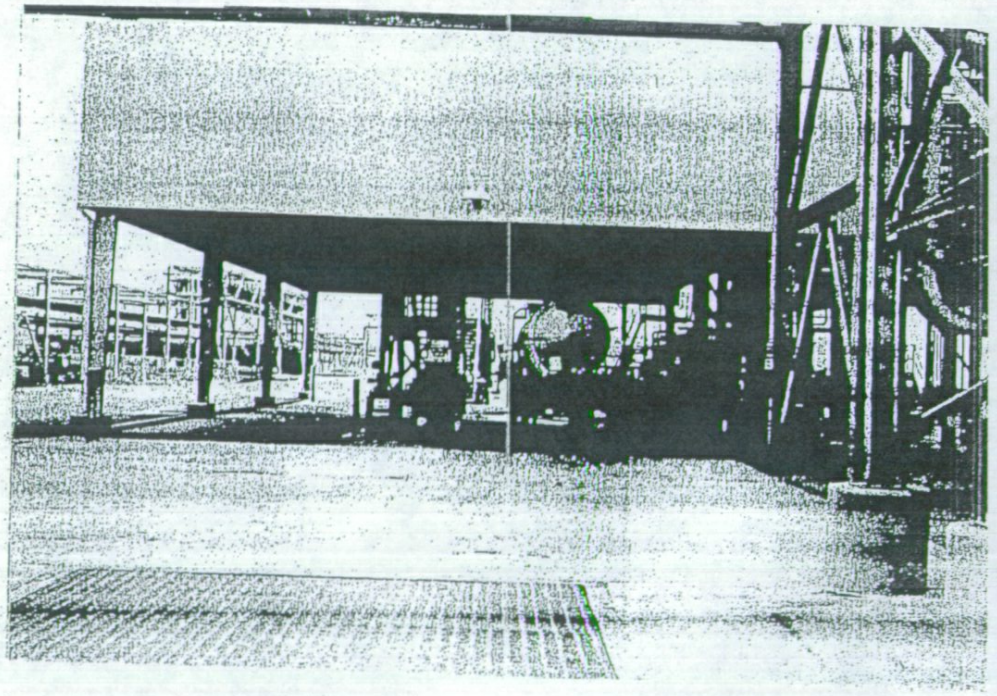


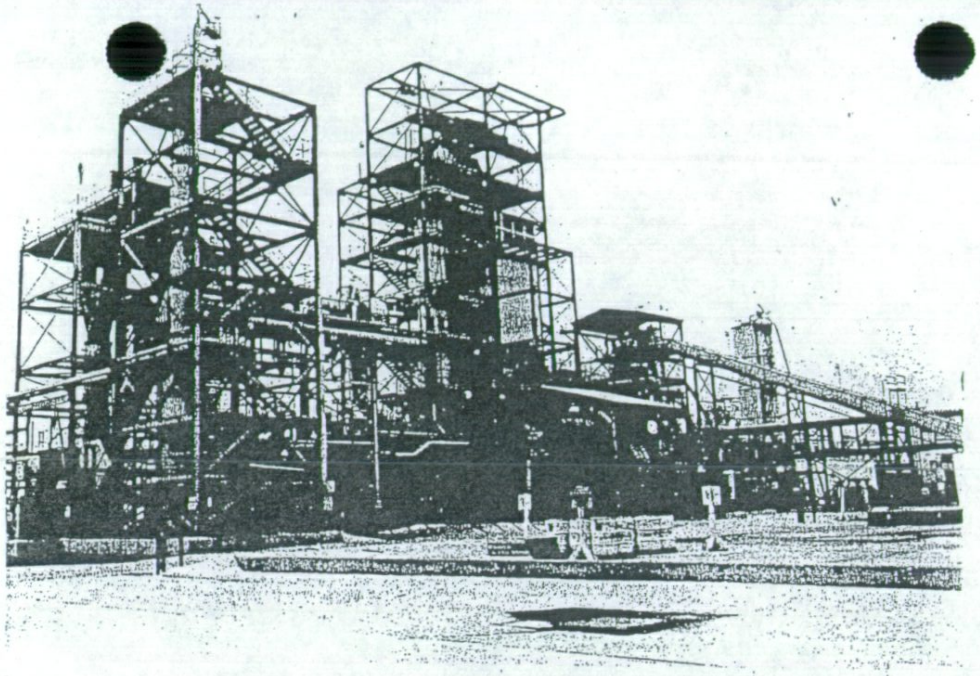


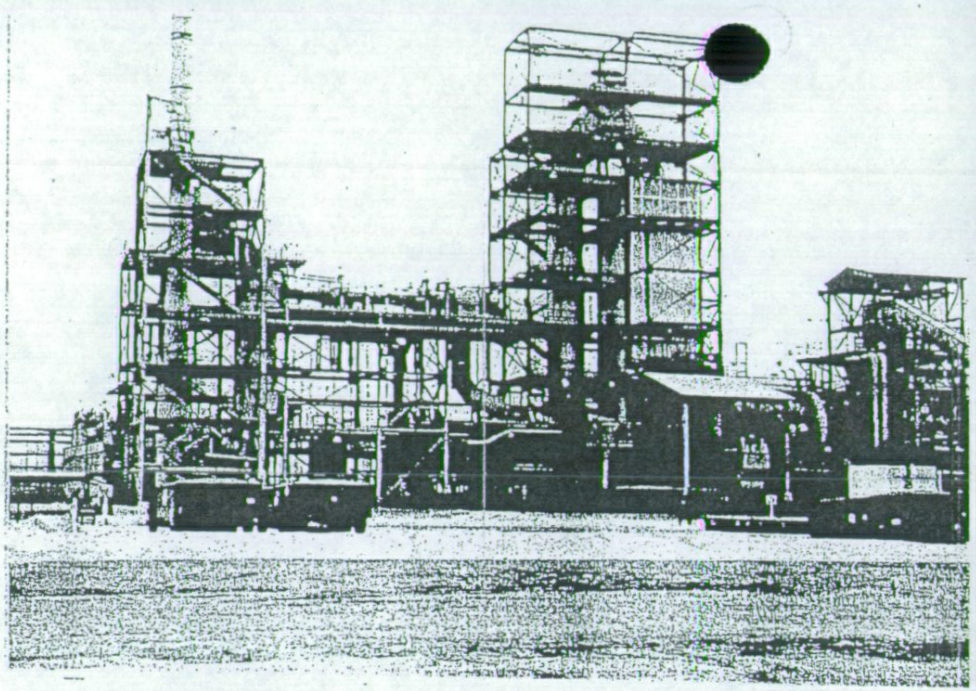


Truck Unloading Area

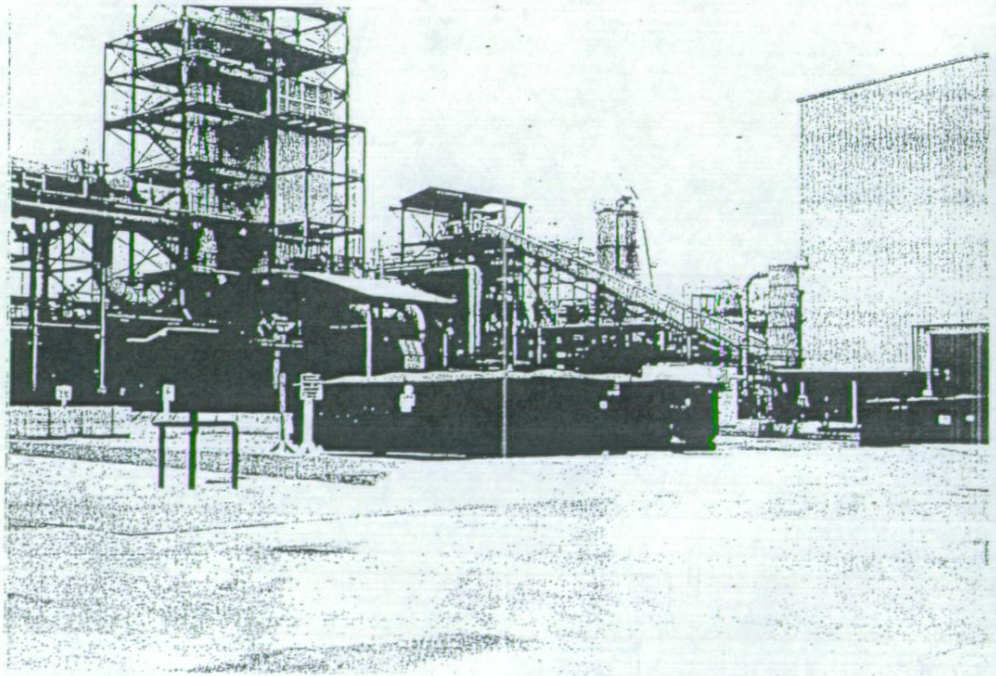








Ash/Waste
Staging Area



Agency Interest Number: 2367

Department of Environmental Quality
Permits Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
(225) 765-0219

Addendum to Permit Applications per LAC 33:I.1701

Please Type Or Print

Company Name
Syngenta Crop Protection, Inc.*

Parent Company (if Company Name given above is a division)

Plant name (if any)
St. Gabriel Plant Site

Nearest town
St. Gabriel

Parish where located
Iberville

Use attachments to provide the required information. "NA" is not an acceptable answer. If a particular section does not apply to you, explain why.

1. Please provide a list of the states where you as applicant* have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying.

*This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.

2. Do you owe any outstanding fees or final penalties to the Department? If so, please explain.

3. Under the laws of the state of Louisiana, are you required to register with the Secretary of State? If required to do so, are you registered with the Secretary of State? Please provide proof of registration.

Certification:

I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Addendum to the Permit Application, including all attachments thereto are true, accurate, and complete.

Responsible Official

Name
Robert W. Slaven

Title
St. Gabriel Plant Site Manager

Company
Syngenta Crop Protection, Inc.

Suite, mail drop, or division

or P.O. Box
Post Office Box 11

City
St. Gabriel

State
LA

Zip
70776

Business phone
(225) 642-1200

Signature of responsible official(s)
RW Slaven

Date
01/25/01

12/19/03

a/08/04

The Department may require the submission of additional information if it deems such information necessary.

The formation date of Syngenta Crop Protection, Inc. was January 1, 2001.

SYNGENTA CROP PROTECTION, INC.

ST. GABRIEL PLANT SITE

AGENCY INTEREST # 2367

LAD053783445-MO-1

ADDENDUM TO PERMIT APPLICATIONS PER

LAC 33:I.1701

Item #1 States Where Syngenta Crop Protection, Inc. Have RCRA Part A Permits

- Alabama
- California
- Florida
- Illinois
- Louisiana
- Mississippi
- Nebraska
- New York
- North Carolina
- Texas

States Where Syngenta Crop Protection, Inc. Have RCRA Part B Permits:

- Louisiana
- North Carolina
- Texas

Item #2 Outstanding Fees or Penalties

Based on our current knowledge, Syngenta Crop Protection, Inc. does not owe any outstanding fees or final penalties to the Louisiana Department of Environmental Quality (LDEQ).

Item #3 Registration With Secretary of State

Attached is a copy of the Certificate of Registration with the Secretary of the State of Louisiana for Syngenta Crop Protection, Inc.

UNITED STATES OF AMERICA

State of Louisiana

Fox McKeithen

SECRETARY OF STATE

I, Secretary of State, of the State of Louisiana, I do hereby Certify that

an Amended Application for Certificate of Authority form of

NOVARTIS CROP PROTECTION, INC.

Domiciled at WILMINGTON, DELAWARE, changing the corporate name to SYNGENTA CROP PROTECTION, INC.,

Was filed and recorded in this office on June 22, 2000.

In testimony whereof, I have hereunto set my hand and caused the Seal of my Office to be affixed at the City of Baton Rouge on,

June 22, 2000

Fox McKeithen

BBE 34555617F 34956496

Secretary of State

STATE OF LOUISIANA
UNION JUSTICE
CONFIDENCE
SECRETARY OF STATE

REPORTS

UPDATED AUTHORIZATION TO SIGN

REPORTS REQUIRED BY PERMIT

All reports required by the Hazardous Waste Permit and other information requested by the Administrative Authority shall be signed by the individuals occupying either of the following positions:

- Site Regulatory Lead
- Environmental Regulatory Affairs Sr. Staff Engineer/Staff Engineer

All Hazardous Waste Permit Applications and Modifications will continue to be signed and certified by the St. Gabriel Plant Site Manager

Authorization for reports by:

RW Slaven Date: 9/8/04

Robert Slaven
St. Gabriel Plant Site Manager

MAIL THE COMPLETED FORM TO: The Appropriate EPA Regional or State Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**	

1. Reason for Submittal (See instructions on page 25) CHECK CORRECT BOX(ES)	Reason for Submittal: ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). ☒ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #_____). ☐ As a component of the Hazardous Waste Report.
2. Site EPA ID Number (See instructions on page 26)	EPA ID Number: LAD 053 783 445
3. Site Name (See instructions on page 26)	Name: SYNGENTA CROP PROTECTION, INC.
4. Site Location Information (See instructions on page 26)	Street Address: 3905 HWY 75 City, Town, or Village: ST. GABRIEL — State: LOUISIANA County Name: IBERVILLE — Zip Code: 70776
5. Site Land Type (See instructions on page 26)	Site Land Type: ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Classification System (NAICS) Code(s) for the Site (See Instructions on page 26)	A. 32532 — B. 325188 C. 325199 — D.
7. Site Mailing Address (See instructions on page 27)	Street or P. O. Box: P.O. BOX 11 City, Town, or Village: ST. GABRIEL State: LOUISIANA Country: UNITED STATES — Zip Code: LOUISIANA
8. Site Contact Person (See instructions on pages 27)	First Name: RICHARD — MI: B. — Last Name: BOUDREAU Phone Number: (225) 642-1257 — Phone Number Extension:
9. Legal Owner and Operator of the Site (See instructions on pages 27 and 28)	A. Name of Site's Legal Owner: SYNGENTA CROP PROTECTION, INC. — Date Became Owner (mm/dd/yyyy): 01/01/2001 Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other B. Name of Site's Operator: SYNGENTA CROP PROTECTION, INC. — Date Became Operator (mm/dd/yyyy): 01/01/2001 Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

EPA ID No. LAD053783445

Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 28 to 32)

Hazardous Waste Activities

1. Generator of Hazardous Waste (choose only one of the following three categories)

- [X] a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- [ ] d. United States Importer of Hazardous Waste
- [ ] e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

- [ ] 2. Transporter of Hazardous Waste
- [X] 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- [X] 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace
  - [ ] a. Small Quantity On-site Burner Exemption
  - [ ] b. Smelting, Melting, and Refining Furnace Exemption
- [ ] 6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	[X]	[X]
b. Pesticides	[X]	[X]
c. Thermostats	[ ]	[ ]
d. Lamps	[X]	[X]
e. Other (specify) _____	[ ]	[ ]
f. Other (specify) _____	[ ]	[ ]
g. Other (specify) _____	[ ]	[ ]

- [ ] 2. Destination Facility for Universal Waste
  Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter - Indicate Type(s) of Activity(ies)
   - [ ] a. Transporter
   - [ ] b. Transfer Facility
2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
   - [ ] a. Processor
   - [ ] b. Re-refiner
- [ ] 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
   - [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
   - [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 33)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	D012	D013	D014
D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043	F001	F002	F003	F004	F005	F024

EPA ID No. | L | A | D | 0 | 5 | 3 | 7 | 8 | 3 | 4 | 4 | 5 |

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 33)

SECTION 11 BOX A CONTINUED - K157, K158, K159 - SEE ATTACHED LIST FOR COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (See instructions on page 33)

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
RW Slaven	ROBERT W. SLAVEN, PhD - SITE MANAGER	

SYNGENTA CROP PROTECTION, INC.
ST. GABRIEL FACILITY
DESCRIPTION OF REGULATED WASTES
COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTE

P001	P002	P003	P004	P005	P006	P007	P008
P009	P010	P011	P012	P013	P014	P015	P016
P017	P018	P020	P021	P022	P023	P024	P026
P027	P028	P029	P030	P031	P033	P034	P036
P037	P038	P039	P040	P041	P042	P043	P044
P045	P046	P047	P048	P049	P050	P051	P054
P056	P057	P058	P059	P060	P062	P063	P064
P065	P066	P067	P068	P069	P070	P071	P072
P073	P074	P075	P076	P077	P078	P081	P082
P084	P085	P087	P088	P089	P092	P093	P094
P095	P096	P097	P098	P099	P101	P102	P103
P104	P105	P106	P108	P109	P110	P111	P112
P113	P114	P115	P116	P118	P119	P120	P121
P122	P123	P127	P128	P185	P188	P189	P190
P191	P192	P194	P196	P197	P198	P199	P201
P202	P203	P204	P205	U001	U002	U003	U004
U005	U006	U007	U008	U009	U010	U011	U012
U014	U015	U016	U017	U018	U019	U020	U021
U022	U023	U024	U025	U026	U027	U028	U029
U030	U031	U032	U033	U034	U035	U036	U037
U038	U039	U041	U042	U043	U044	U045	U046
U047	U048	U049	U050	U051	U052	U053	U055
U056	U057	U058	U059	U060	U061	U062	U063
U064	U066	U067	U068	U069	U070	U071	U072
U073	U074	U075	U076	U077	U078	U079	U080
U081	U082	U083	U084	U085	U086	U087	U088
U089	U090	U091	U092	U093	U094	U095	U096
U097	U098	U099	U101	U102	U103	U105	U106
U107	U108	U109	U110	U111	U112	U113	U114
U115	U116	U117	U118	U119	U120	U121	U122
U123	U124	U125	U126	U127	U128	U129	U130
U131	U132	U133	U134	U135	U136	U137	U138
U140	U141	U142	U143	U144	U145	U146	U147
U148	U149	U150	U151	U152	U153	U154	U155
U156	U157	U158	U159	U160	U161	U162	U163
U164	U165	U166	U167	U168	U169	U170	U171
U172	U173	U174	U176	U177	U178	U179	U180
U181	U182	U183	U184	U185	U186	U187	U188
U189	U190	U191	U192	U193	U194	U196	U197
U200	U201	U202	U203	U204	U205	U206	U207
U208	U209	U210	U211	U213	U214	U215	U216
U217	U218	U219	U220	U221	U222	U223	U225
U226	U227	U228	U234	U235	U236	U237	U238
U239	U240	U243	U244	U246	U247	U248	U249
U271	U278	U279	U280	U328	U353	U359	U364
U367	U372	U373	U387	U389	U394	U395	U404
U409	U410	U411					

TABLE OF CONTENTS

TABLE OF CONTENTS

LIST OF ATTACHMENTS

BODY
OF
PERMIT

DRAFT
MODIFIED OPERATING PERMIT

Syngenta Crop Protection, Inc.

EPA ID# LAD 053 783 445
Agency Interest# 2367
PER20070027

Iberville Parish
St. Gabriel, Louisiana

Permit Number LAD053783445-RN-OP-1-MO-1

I. PERMIT PREAMBLE

This Permit is issued to Syngenta Crop Protection, Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder and by the U.S. Environmental Protection Agency (USEPA) under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA).

For the purposes of the Permit, "administrative authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This Permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be constructed and operated as specified in the application.

This Permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulation adopted thereunder.

All definitions contained in this Permit shall have the meaning as defined in Louisiana Administrative Code (LAC 33:V.Subpart 1) unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of issuance of this Permit. New and/or amended regulations are not included as Permit requirements until Permit modification procedures as specified in Section II.C. of the Permit are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

The Permittee is allowed to store, treat, or dispose of hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 942 U.S.C. 9606 (a).

Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorized any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation of modification of this permit. The Permittee must inform the administrative authority of any deviation from, changes in, or inaccuracies in the information in the permit application.

The administrative authority may also suspend, modify, revoke and reissue, or terminate permit for cause or when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The administrative authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulation, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the administrative authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the administrative authority, within a reasonable time, any information which the administrative authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the administrative authority upon request, copies of records required by this permit.

II.E.8. Inspection and Entry

The Permittee shall allow the administrative authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the administrative authority any substances or parameters at any location.

II.E.9. Sample Monitoring

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan as listed in Attachment 1, "List of Facility Documents Incorporated In The Permit By Reference".

II.E.9.b. Records of monitoring information shall include:

II.E.9.b.(1) the date, exact place, and time of sampling or measurements;

II.E.9.b.(2) the name(s) and signature(s) of the individual(s) who performed the sampling or measurements:

II.E.9.b.(3) the date(s) analyses were performed;

II.E.9.b.(4) the name(s) and signature(s) of the individual(s) who performed the analysis;

II.E.9.b.(5) the analytical techniques or methods used;

II.E.9.b.(6) the results of such analyses; and

II.E.9.b.(7) associated quality assurance performance data.

II.E.10. Retention of Records

The Permittee shall maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility and for the post-closure care period in accordance with LAC 33:V.309.J.2.

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All

records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the facility, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the administrative authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:B.309.L.1.

II.E.12. Physical Facility after Modification or Construction

No new unit, or existing unit which will undergo a major modification may be used to treat, store, or dispose hazardous waste until the unit is complete and:

II.E.12.a. the Permittee has submitted to the administrative authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the administrative authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the Permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the administrative authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, 1531 and other requirements if necessary.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:I.3901, et seq. ("Notification Regulation and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended.) This report shall include the following:

II.E.16.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.16.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.16.b.(1) name, address, and telephone number of the owner or operator;

II.E.16.b.(2) name, address, and telephone number of the facility;

II.E.16.b.(3) date, time, and type of incident;

II.E.16.b.(4) name and quantity of materials involved;

II.E.16.b.(5) the extent of injuries, if any;

II.E.16.b.(6) an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.16.b.(7) estimated quantity and disposition of recovered material that resulted from the incident.

II.E.17. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I. 3901, "Notification Regulations and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended, the report shall be submitted in accordance with those regulations. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee shall submit a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.18. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Section II.E.16. above.

II.E.19. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the administrative authority, the Permittee shall promptly submit such facts or information.

II.E.20. Signatory Requirement

All applications, reports or other information submitted to the administrative authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.21. **Schedule of Compliance**

II.E.21.a. The Permittee shall demonstrate compliance with the air emission standards and limitations in 40 CFR Part 63, Subpart EEE by conducting a comprehensive performance test and submitting a Notification of Compliance (NOC) to the Louisiana Department of Environmental Quality, Office of Environmental Services, Permits Division.

II.E.21.b. The Permittee shall, at the same time of the comprehensive performance test to demonstrate compliance with 40 CFR Part 63, Subpart EEE, perform a risk trial burn to evaluate indirect risk under 40 CFR 270.32(b)(2), the omnibus authority.

II.E.21.c. The Permittee shall, upon completion of the performance test, risk trial burn and submittal of the Notification of Compliance (NOC), request a modification of both the RCRA and Title V permits based upon the test results.

II.E.21.d. The Permittee shall, upon completion of the risk trial burn and submittal of the trial burn report, which is due within 90 days after completion of the trial burn, notify the Environmental Protection Agency, Region 6 and request an indirect risk assessment based upon the risk trial burn report.

II.E.21.e. The Permittee shall within 90 days of issuance of this permit initiate closure of the Liquid Incinerator that has not been operated since the request for the modification of this permit in April 2001.

II.E.21.f. The Permittee shall within 60 days after permit becomes effective submit a Security Plan to the Office of Environmental Services, Permits Division, for review and approval.

II.E.22. **Additional Operating Standards**

(RESERVED)

II.E.23. **Documents To Be Submitted**

II.E.23.a. The Permittee shall submit, if not within the past two (2) years, an updated tank certification report for the existing tanks in Table 4 in accordance with LAC 33:V.1903.B

within six (6) months of the effective date of this permit. The Permittee must also include any raw data with the report.

II.E.23.b. The Permittee shall submit a tank certification report for new/proposed tanks in Table 6 prior to operation in accordance to LAC 33:V.1905.G. The Permittee must also include any raw data with the report.

II.E.24. Documents To Be Maintained at Facility Site

II.E.24.a. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.24.a.(1) Waste analysis plan submitted in accordance with LAC 33:V.1519 (see Attachment 1).

II.E.24.a.(2) Personnel training plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.24.a.(3) Contingency plan submitted in accordance with LAC 33:V.1513 (see Attachment 1).

II.E.24.a.(4) Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.24.a.(5) Closure plan submitted in accordance with LAC 33:V.3511 and any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.24.a.(6) Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.24.a.(7) Operating records as required by LAC 33:V.1529 and 2115.D.

II.E.24.a.(8) Inspection plan and schedules developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

II.E.24.a.(9) Security plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.24.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the administrative authority for approval.

II.E.25. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.26. Manifest

The Permittee shall report manifest discrepancies and unmanifested waste as required by LAC 33:V.309.L.8 and 9.

II.E.27. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.28. Waste Discharges

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.29. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Section IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the administrative authority in accordance with Section II.E.19 of the General Permit Conditions.

II.E.30. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Section VII).

II.E.31. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.32. Incinerator MACT Provisions

The Environmental Protection Agency (EPA) has established an interim final rule on hazardous waste combustor (HWC) emission standards. The emission standards were issued under the joint authority of the Clean Air Act and the Resource Conservation and Recovery Act. The HWC rule sets Maximum Achievable Control Technology (MACT) emission standards for hazardous waste incinerators. The emission standards and operating procedures for affected facilities are codified at 40 CFR, Part 63, Subpart EEE.

In an effort to avoid a delay of issuance of a permit, the Permittee shall operate the Multi-Purpose Rotary Kiln in accordance with the incinerator operating conditions originally set forth in the modified hazardous waste permit (dated June 1996) and specified in Section V.C of this permit. The Permittee has recently completed a Comprehensive Performance Test (CPT) in accordance with the procedures specified in 40 CFR, Part 63, Subpart EEE. The Permittee shall submit a Notification of Compliance and the results of the CPT to the Louisiana Department of Environmental Quality, Office of Environmental Assessment, Environmental Technology Division within ninety (90) days of completion of testing. The results from the testing shall be used for the purpose of determining compliance with the performance standards of 40 CFR 264.343 or 40 CFR Part 63, Subpart EEE, and for determining adequate operating conditions under 40 CFR 264.345 or 40 CFR Part 63, Subpart EEE. After the approved trial burn or other testing is completed, the unit shall be operated in accordance with the operating conditions in effect prior to the commencement of the testing. The permittee may request a permit modification or amendment pursuant to LAC 33:V.321 and 322 to incorporate the new operating conditions demonstrated by the trial burn or testing results.

The administrative authority will review the comprehensive performance test results and the Notification of Compliance to determine whether the Permittee has demonstrated compliance with the HWC MACT provisions. The administrative authority will provide written notification to the Permittee regarding the transfer of applicability of operating conditions for the incinerator from the RCRA permit to the Clean Air Act (CAA) Title V permit (Permit No. 2718-VO).

II.E.33. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Section VII of this Permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

II.E.34. Attachments and Documents Incorporated by Reference

All attachments and documents required by this Permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this Permit by reference and become an enforceable part of this Permit. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the Permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this Permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this Permit according to procedures in Section II.C of this Permit.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee shall maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. Out-of-state hazardous wastes generated from Syngenta Crop Protection (U.S.) facilities (owned, operated and managed by Syngenta Crop Protection, Inc.); wholly owned subsidiaries; affliliates, NAFTA affiliates, and associated facilities, as defined below, may be shipped to the Syngenta Crop Protection, St. Gabriel Plant for storage, treatment and disposal. The following restrictions apply to this hazardous waste:

III.A.2.a. The Permittee must bear the total cost of handling, transporting, storing, treating and disposing of all hazardous waste brought into the St. Gabriel site (LAD053783445) from off-site. Under no circumstance shall the Permittee receive compensation or other consideration for hazardous waste received at the facility.

III.A.2.b. Out-of-state hazardous waste allowed to be brought into the Syngenta St. Gabriel facility for incineration from Syngenta Corporate entities, subsidiaries and associated facilities shall be limited to 50% of the total permitted capacity of the St. Gabriel facility. A list of such facilities (as referenced in Section III.A.3 of this permit) and amounts of waste received from each facility shall be submitted to the Administrative Authority each year with the annual report.

III.A.2.c. No out-of-state hazardous waste shall be allowed to be brought into the Syngenta St. Gabriel site that is:

- generated from products that have been purchased, changed ownership or otherwise entered the stream of commerce;
- hazardous waste generated as a result of a recall by a governmental authority of a Syngenta product;

- products voluntarily recalled by Syngenta in connection with a specific product stewardship program;

except, upon prior notice and approval from the Administrative Authority.

III.A.2.d. Also allowable are: hazardous wastes generated as a result of Syngenta products going as, off-specification products, products becoming contaminated, and Syngenta materials spilled in transit or hazardous wastes otherwise generated from Syngenta materials during storage and transportation of these materials.

III.A.2.e. The following definitions apply to the Permittee:

SYNGENTA CROP PROTECTION, INC. - Facilities owned and operated in the United States under the management and name of SYNGENTA CROP PROTECTION, INC.

SUBSIDIARIES - Facilities operated and managed in the United States, which are wholly owned by SYNGENTA CROP PROTECTION, INC.

ASSOCIATED FACILITIES - These are facilities which are not owned or operated by Syngenta Crop Protection, Inc., its Subsidiaries, its Parent, Affiliates or NAFTA Affiliates ("Syngenta Entities"), but are performing a processing service for those entities (e.g., packaging, blending, refining, formulating) using material(s) owned and provided by Syngenta Entities and resulting in end products owned by Syngenta Entities. Associated facility wastes also include: hazardous wastes generated as a result of Syngenta Entities' products going out of date; off specification products; approved product recalls; products becoming contaminated, and Syngenta Entity material spilled in transit. Syngenta Entity wastes generated from Syngenta Entities' materials during storage and transportation of Syngenta Entities' materials are also included.

III.A.3. When importing hazardous waste from their NAFTA affliliates for incineration in the Multi-Purpose Rotary Kiln, the Permittee must comply with LAC 33:V.1123 (Imports of Foreign Hazardous Waste). A list denoting the amount of packaged product shipped to the NAFTA Affiliates ("Syngenta Entities"), performing a processing service for

those entities (e.g., packaging, blending, refining, formulating) using material(s) owned and provided by Syngenta Entities versus the hazardous wastes generated and imported into the State of Louisiana for management in the Multi-Purpose Rotary Kiln must be provided in the annual report.

III.B. REQUIRED NOTICE

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste to be shipped by the generator. The Permittee must keep a copy of this written notice as part of the operating record as required by LAC 33:V.1527.E.

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan (Attachment 1) and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the administrative authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit annually, a certified statement indicating that any commercial laboratory providing analytical results and test data to the Department must be accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I.Subpart 3, Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

III.C.2.a In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;

- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by the Department regulations

This includes, but is not limited to data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

III.C.2.b If the Permittee decides to use their own "in-house" laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document and submit for approval, quality assurance/quality control procedures that commensurate with requirements in LAC 33:I.Subpart 3. Laboratory Accreditation.

III.C.2.c For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I Chapter 9.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and recharacterize all hazardous waste streams generated by the Permittee onsite and shipped offsite, or treated, stored or disposed onsite. The Permittee must recharacterize wastes in accordance with LAC 33:V.1519.A.3. This recharacterization shall include laboratory analyses and/or process knowledge which provide information needed to properly treat, store and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this recharacterization shall be summarized in the Permittee's Annual Report.

III.C.4. The Permittee shall submit documentation if they contract with an outside laboratory for any service required by the Waste Analysis Plan or LAC 33:V.Chapter 15. This document shall be resubmitted when a different laboratory is contracted. The Permittee shall also submit documentation that the laboratory complies with the accreditation requirements of LAC 33:I.Chapter 45.

III.C.5. The Permittee shall perform manifest verification analysis according to the Waste Analysis Plan. For each treatment or disposal method, a minimum of one (1) bulk load for each waste stream received in a 24-

hour period (except for highly reactive direct burn materials) must be sampled and analyzed as specified in the Waste Analysis Plan.

III.C.6. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee shall comply with the security provisions of LAC 33:V.1507 and as specified in the Security Plan referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule referenced in Attachment 1 of this permit. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections shall be kept as required by LAC 33:V.1509.D. The inspection schedule shall include the regulatory requirements of LAC 33:V. 517.G, 1509.A, 1905, 1911, 2109, and 3119.

III.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by LAC 33:V.1515.A. This training program shall follow the outline in the training plan referenced in Attachment 1 and maintained at the facility. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee shall not place any hazardous waste unit on any portion of the property that lies within the 100 year floodplain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3.

Such site improvements shall be certified by independent licensed professional engineers and approved by LDEQ prior to any hazardous waste and/or hazardous waste facilities being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control and/or containment of run-on and run-off from the maximum rainfall occurring in 24 hours from a 25 year storm as defined by local rainfall records and LAC 33:V.1503.B.2 (when maximum rainfall records are not available, the design standard shall be 12 inches, south of 31 degrees North latitude and 9 inches north of 31 degrees North latitude where 25 year rainfall records are not available). The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b; 2111.B.4, B.5, and B.6.

III.J. HURRICANE EVENTS

The Permittee shall initiate those applicable portions of the contingency plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509, and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K 1. Required Equipment

At a minimum, the Permittee shall install and maintain the equipment set forth in the contingency plan as required by and which is in conformance with LAC 33:V.1511.C.

III.K 2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified in Section III.K.1 to insure its proper operation in time of emergency.

III.K 3. Access to Communications or Alarm Systems

The Permittee shall maintain access to the communications or alarm systems as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K 4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F and 2109.B.

III.K 5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G. have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of annual written renewal of arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the contingency plan, referenced in Attachment 1 of this permit, which complies with the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee shall comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee shall review and amend in a timely manner (if necessary), the contingency plan, as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee shall comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 9.

III.N. RECORDKEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, 1529.B, and 1529.C. and included in the permit as the Operations Plan referenced in Attachment 1.

III.N.2. Annual Report

The Permittee shall comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment, storage, and disposal facilities.

III.O. CLOSURE/POST-CLOSURE

CLOSURE

The closure plan shall include the following responses by the Permittee to LAC 33:V.1915, 3121, 3503, 3505, 3507, 3509, 3511, 3513, and 3515.

III.O.1. Closure Plan. The Permittee shall close the facility in accordance with the closure plan referenced in Attachment 1, and applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan. The Permittee shall amend the closure plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322, and 323 where applicable.

III.O.3. Notification of Closure. The Permittee shall notify the administrative authority at least 45 days prior to the date he expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, and LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and dispose all facility equipment in accordance with the closure plan, and LAC 33:V.3515.

III.O.6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure. The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed in Table 1.

TABLE 1
(1) Existing Tanks

EXISTING TANKS	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4402-F	Organic Waste	Tank Farm Number 1	18,500 Gallons
4403-FA	Aqueous Waste	Tank Farm Number 1	24,370 Gallons
4403-FB	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FC	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FD	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FE	Organic Waste	Tank Farm Number 1	24,300 Gallons
4403-FG	Aqueous/Organic Waste	Tank Farm Number 1	24,300 Gallons
4404-F	Organic Waste	Tank Farm Number 1	16,000 Gallons
4604-F1	Bulk (solid/sludge)	Kiln Area	3,000 Gallons
4609-F	Sludge Waste	Kiln Area	34,500 Gallons
4619-F	Hydro-Recirculation	APC Area	3,500 Gallons
4620-F	Entrainment Separator/Flue Gas Residuals	APC Area	3,500 Gallons

(2) Planned Tanks

PLANNED TANK	SERVICE	LOCATION	MAXIMUM CAPACITY
4403-FF	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4403-FH	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FJ	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FK	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4606-FA	Organic Waste	Tank Farm Number 2	10,000 Gallons
4606-FB	Organic Waste	Tank Farm Number 2	10,000 Gallons
4607-FA	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FB	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FC	Aqueous Waste	Tank Farm Number 2	15,000 Gallons

(3) Existing Container Storage

CONTAINER STORAGE	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
Covered Warehouse	Covered Storage Area Number 2	Rotary Kiln Area	39,000 Gallons
Truck Loading and Unloading	Truck Loading and Unloading Area	Rotary Kiln Area	12,000 Gallons
Incinerator Ash	Incin. Ash/Waste Handling Area	Rotary Kiln Area	74,000 Gallons

(4) Multi-Purpose Rotary Kiln

INCINERATOR	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
Multi-Purpose Rotary Kiln	Solid/Slurries/Liquid Waste	Rotary Kiln Area	18.1335 Short tons/hr

Closure will include the kiln, afterburner, all gas cooling and cleaning equipment, fan, stack, and all feed and loading equipment.

In addition to the above listed units, the closure cost must include allowances for decontaminating the buildings, associated equipment and adjacent contaminated soils.

III.P. POST-CLOSURE

III.P.1. The Permittee will attempt to clean close all units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the administrative authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements in accordance with LAC 33:.3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.P.2. The Permittee shall amend the post-closure plan when necessary, in accordance with LAC 33:V.3523.D. Any modifications shall be subject to LAC 33:V.321.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of all facilities in accordance with LAC 33:V.3705 and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:V.3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive. The closure cost estimate shall be

based on the maximum permitted inventory of each facility as specified in Condition III. Table 1 of this permit.

III.Q.5. The Permittee's post-closure cost estimate of all facilities as required by LAC 33:V.3709.A shall be included in separate post-closure plans.

III.Q.6. The Permittee shall maintain and adjust the post-closure cost estimate for inflation in accordance with LAC 33:V.3709.B.

III.Q.7. The Permittee shall adjust the post-closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the post-closure plan in accordance with LAC 33:V.3709.C. The Permittee shall consider the impact of any inventory and/or process changes on the post-closure cost estimate.

III.Q.8. The post-closure cost estimate must equal the annual post-closure cost multiplied by the number of years in the post-closure period as specified in LAC 33:V.3521.A.

III.Q.9. Any closure/post-closure modifications are subject to LAC 33:V.321.

III.R. FINANCIAL ASSURANCE FOR CLOSURE UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Section III.O.7.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences for treatment, storage, and disposal facilities or a group of such facilities in accordance with LAC 33:V.3715.A.

If a surface impoundment, landfill, land treatment facility, miscellaneous disposal unit or a group of such facilities are being used to manage hazardous waste, the Permittee shall also have and maintain liability coverage for non-sudden accidental occurrences in accordance with LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee shall comply with LAC 33:V.3717 whenever bankruptcy is initiated for Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee shall immediately notify the administrative authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

IV. PERMITTED FACILITIES

The following facilities are permitted to be used in hazardous waste service:

IV.A. TANKS

TABLE 2
(1) Existing Tanks

EXISTING TANKS	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4402-F	Organic Waste	Tank Farm Number 1	18,500 Gallons
4403-FA	Aqueous Waste	Tank Farm Number 1	24,370 Gallons
4403-FB	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FC	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FD	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FE	Organic Waste	Tank Farm Number 1	24,300 Gallons
4403-FG	Aqueous/Organic Waste	Tank Farm Number 1	24,300 Gallons
4404-F	Organic Waste	Tank Farm Number 1	16,000 Gallons
4604-F1	Bulk (solid/sludge)	Kiln Area	3,000 Gallons
4609-F	Sludge Waste	Kiln Area	34,500 Gallons
4619-F	Hydro-Recirculation	APC Area	3,500 Gallons
4620-F	Entrainment Separator/Flue Gas Residuals	APC Area	3,500 Gallons

(2) Planned Tanks

PLANNED TANK	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4403-FF	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4403-FH	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FJ	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FK	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4606-FA	Organic Waste	Tank Farm Number 2	10,000 Gallons
4606-FB	Organic Waste	Tank Farm Number 2	10,000 Gallons
4607-FA	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FB	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FC	Aqueous Waste	Tank Farm Number 2	15,000 Gallons

IV.B. CONTAINER STORAGE (3)

The container storage areas listed in Table 3 below are permitted to store hazardous waste in properly labeled and sealed containers which have been specified for this service and are compatible with the contained waste. The containers shall be stored on pallets stacked at a maximum of two (2) high and no more than four (4) large containers per tier on the pallet (more than four (4) small containers and lab packs may be stored on each pallet) and conform to LAC 33:V.2109.B. The pallets will be placed in rows with a minimum of two (2) feet of aisle space between rows.

TABLE 3
(3) Existing Container Storage

CONTAINER STORAGE	SERVICE	LOCATION	PERMITTED STORAGE AREA (ft^2)	MAXIMUM PERMITTED STORAGE VOLUME (ft^3)
Covered Warehouse	Covered Storage Area Number 2	Rotary Kiln Area	11,540	39,000 Gallons
Truck Loading and Unloading	Truck Loading and Unloading Area	Rotary Kiln Area	3,490	12,000 Gallons
Incinerator Ash	Incin. Ash/Waste Handling Area	Rotary Kiln Area	11,700	74,000 Gallons

IV.C. INCINERATOR

Multi-Purpose Rotary Kiln

The Permittee has approval to operate a rotary kiln with afterburner section and ancillary equipment that has a nominal capacity of eighty-five million, five hundred thousand (85,500,000) Btu/hr. The rotary kiln has nominal dimensions of twelve (12) feet diameter (I.D.) by forty (40) feet long and an afterburner section approximately thirty-eight (38) feet long with inside horizontal dimensions of approximately twelve (12) feet x fifteen (15) feet. The incinerator system consists of the following components or systems:

a. Multi-Purpose Rotary Kiln (MPI)

b. Secondary Combustion Chamber (SCC)

c. Combustion Air Blowers

d. Sludge Storing and Handling

e. Solids Storage, Handling and Shredding

f. Quench Chamber

g. Particle Conditioner

h. Dual Hydrosonic Scrubbers

i. Induced Draft Fan

j. Effluent Exhaust Stack

k. Ash Storage Area

l. Truck Loading and Unloading Area

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. TANKS

V.A.1. General Conditions for Existing and Planned Tanks

V.A.1.a. The conditions related to treatment and/or storage of hazardous waste shall be limited to those tanks listed under Permit Section IV.A, Permitted Facilities, together with all associated piping, pumps, instruments, containments, and vent controls.

V.A.1.b. The Permittee shall design, construct, and maintain secondary containment for all tank systems in accordance with the administrative authority and LAC 33:V.1907.

V.A.1.c. The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 1917, and 1919.

V.A.1.d. The Permittee is prohibited from storing or treating hazardous waste for more than ninety (90) days in units not identified in Permit Section IV.A, unless the activity is exempt from regulations or allowed by an Emergency Permit.

V.A.1.e. The Permittee shall conform, where applicable, to the appropriate sections of the most recent edition of API Codes 653 or 510, and ASME Standards for maintenance inspection, rating, repair, and alteration of all pressure vessels and tanks [atmospheric and/or low pressure storage vessels and tanks]. Such codes establish the procedures for repairing sections of tanks, nozzles or other openings and are specifically detailed in the above listed API Codes and ASTM Standards.

V.A.1.f. The Permittee shall manage hazardous waste in tanks according to the air emissions standards of LAC 33:V. Chapter 17, Subchapter C, except for a tank for which a certification has been submitted to the Administrative Authority, under LAC 33:V.1747.B.7, that the tank is equipped with an operating air emission controls in accordance with 40 CFR 63. Subpart DD.

V.A.1.g. The Permittee shall, upon request, identify all 90-day accumulation tanks or containers which contain or make contact with hazardous waste with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1747 to 1767.

V.A.1.h. New tanks shall not be placed in hazardous waste service until the Permittee has complied with LAC 33:V.303.I.

V.A.1.i. All tanks shall be operated within design limits as specified in Table 4, Table 5 and Table 6.

TABLE 4
TANK DESIGN FOR EXISTING TANKS

TANK	DESIGN CODE	MATERIALS OF CONSTRUCTION	NOMINAL BUILT WALL THICKNESS (INCHES)	MINIMUM PERMITTED WALL THICKNESS (INCHES)*	OPERATING PRESSURE (PSIG)	LININGS
4402-F	ASME VIII, Div. 1"U"	316L SS	0.250	0.125	<15	None
4403-FA	ASME Sec. VIII	C.S	0.375	0.25	<15	None
4403-FB	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FC	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FD	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FE	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FG	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4404-F	ASME	FRP	0.535 BTM 0.415 TOP	N/A	<1	None
4604-F1	ASME	C.S	0.25 SIDES 0.375 FLOOR	0.125	<1	None
4609-F	ASME	C.S	0.625 BTM 0.313 TOP	0.188	<1	None
4619-F	ASTM D4097 ASME RPT-1	FRP	0.275 BTM 0.145 TOP	N/A	<1	None
4620-F	ASTM D4097 ASME RPT-1	FRP	0.275 BTM 0.145 TOP	N/A	<1	None

* – For inspection standard refer to Section V.A.2.c.(4) of this permit

TABLE 5
EXISTING TANKS

TANK	SERVICE	DIMENSIONS (DI X HT)	MAXIMUM PERMITTED CAPACITY (GALLONS)	YEAR BUILT OR PLACED INTO SERVICE
4402-F	Organic Waste	12.5' X 20.5'	18,500 Gallons	2002
4403-FA	Aqueous Waste	14' X 19'	24,370 Gallons	2006
4403-FB	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FC	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FD	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FE	Organic Waste	14' X 19'	24,300 Gallons	1990
4403-FG	Aqueous/Organic Waste	14' X 19'	24,300 Gallons	1990
4404-F	Organic Waste	14' X 16'	16,000 Gallons	1987
4604-F1	Bulk (solid/sludge)	9'10"X13'X5'8"	3,000 Gallons	1995
4609-F	Sludge Waste	12.5' X 39'	34,500 Gallons	1993
4619-F	*Hydro-Recirculation	8' X 11'	3,500 Gallons	1997
4620-F	*Entrainment Separator/Flue Gas Residuals	8' X 11'	3,500 Gallons	1998

*Ancillary equipment - These operations are considered physical treatment under LAC 33:V.1521. They exist as components of identified tank systems and are subject to the appropriate requirements of LAC 33:V.Chapter 19.

TABLE 6
TANK DESIGN FOR PROPOSED TANKS

TANK	DESIGN CODE	MATERIALS OF CONSTRUCTION	NOMINAL BUILT WALL THICKNESS (INCHES)	MINIMUM PERMITTED WALL THICKNESS (INCHES)*	LININGS
4403-FF	ASME Sec. VIII	C.S	0.375	0.25	None
4403-FH	NBS-PS-1569	FRP	1.115 BTM 0.475 TOP	N/A	None
4403-FJ	ASME Sec. VIII	C.S	0.375	0.25	None
4403-FK	NBS-PS-1569	FRP	1.115 BTM 0.475 TOP	N/A	None
4606-FA	API-620	C.S	0.375	0.25	None
4606-FB	ASME	FRP	2.4375 BTM 1.25 TOP	N/A	None
4607-FA	API-620	C.S	0.375	0.25	None
4607-FB	ASME	FRP	2.4375 BTM 1.25 TOP	N/A	None

* – For inspection standard refer to Section V.A.2.c.(4) of this permit

V.A.2. Tank Maintenance, Inspection, and Testing

V.A.2.a. The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in

Table 4 and Table 6 and not exceed the listed operating conditions.

V.A.2.b. The Permittee shall maintain the minimum shell thickness of the permitted tank systems in accordance with LAC 33:V.1903, 1905, and as specified in Table 4 and Table 6.

V.A.2.c. Tank Inspection and Testing and Maintenance of Tanks:

V.A.2.c.(1) The Permittee shall inspect while the facility is in operation, all tanks, piping, valves, vent controls, and associated instrumentation at least daily to detect any exterior signs of corrosion, cracks, or leaks as required by LAC 33:V.1911. Such inspections shall be duly logged in the operating record and any equipment failures, and resulting leaks of spills that are reportable under applicable regulations (CWA, RCRA, SARA) shall be described fully in the annual report.

V.A.2.c.(2) The Permittee's results of the most recent ultrasonic or equivalent tests for existing hazardous waste storage tanks indicates they meet the requirements of the specified permitted wall thicknesses as required by the design specifications (API or ASME) under which they were built. Such information shall be updated biennially and made a part of the annual report due the year the wall thickness measurements are determined.

V.A.2.c.(3) The Permittee will conform, where applicable, to the appropriate sections of the API Code 510 (latest edition) for maintenance inspection, rating, repair, and alteration of all pressure vessels and tanks and atmospheric and/or low pressure storage vessels and tanks (Chapter XIII of the API Code). Such codes establish the procedures for repairing tank sections, nozzles or other openings and are specifically detailed in the above listed API Codes.

V.A.2.c.(4) The Permittee shall conduct shell thickness measurements either biennially (every second year) or as directed by the administrative authority in sufficient quantity to establish data for all listed above ground tanks and vessels.

V.A.2.c.(5) All tanks and ancillary equipment shall be provided with secondary containment that meets the requirements of LAC 33:V.1907.

V.A.2.c.(6) If any shell thickness measurements for areas of the tank as defined in Section V.A.2.c (2) above are less than those listed in Table 4 Table 6 and are not in compliance with the most recent edition of API Codes 653, 510, or ASME Standard, such tank or vessel shall be removed from service and emptied of hazardous waste. The tank or vessel shall be repaired or replaced in accordance with LAC 33:V.1913.F and tested as described in Section V.A.2.c.(2) (above) or equivalent, and the administrative authority notified, before service can be re-established for hazardous waste.

V.A.2.c.(7) Fiberglass reinforced plastic (FRP) tanks shall be taken out of service and repaired when a significant amount of fiberglass is exposed, cracks are visible, softening and swelling occurs, or when delamination is evident.

V.A.2.c.(8) All new/proposed tanks and ancillary equipment must be tested for tightness prior to being placed in use as required by LAC 33:V.1905 D.

V.A.2.d. The pollution control methods used for tanks (See Table 7) shall be inspected on a periodic basis in accordance with the latest Inspection Schedule approved by the administrative authority.

V.A.2.d.(1) Tanks meeting Level 1 controls shall be inspected at least once every year, in accordance with LAC 33:V.1755.C.4.

V.A.2.d.(2) Tanks meeting Level 2 controls shall be inspected in accordance with LAC 1755.E.3 for internal floating roofs, LAC 33:V.1755.F.3 for external floating roofs, LAC 33:V.1755.G.3 for air emission control equipment, and LAC 33:V.1755.I.4 for closed vent control systems.

V.A.2.d.(3) The Permittee shall comply with the applicable requirements under LAC 33:V. Chapter 17, Subchapter C for each tank listed in Table 7.

Table 7
Emission Controls for Tanks

Tank	Service	LAC Reference(s)	Air Emission Controls
4402-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FA	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FB	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FC	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FD	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FE	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FG	Organic/Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4404-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4604-F1	Bulk (solid/sludge)	LAC 33:V.1755.D.3	Level 2 Controls
4609-F	Sludge Waste	LAC 33:V.1755.D.3	Level 2 Controls
4619-F	Hydro-Recirculation	LAC 33:V.1755.D.3	Level 2 Controls
4620-F	Entrainment Separator/Flue Gas Residuals	LAC 33:V.1755.D.3	Level 2 Controls

V.A.3. Operation of All Tank Systems

V.A.3.a. The Permittee shall prevent spills and overflows from the tank or containment systems and prepare daily log sheets which shall be placed in the operating record as required by LAC 33:V.1909 and LAC 33:V.1911. This information shall include the following:

V.A.3.a.(1) All monitored parameters including temperature, pressures, levels, and pump flows into and out of these tanks.

V.A.3.a.(2) Test or inspection of overfilling controls to ensure they are in working order.

V.A.3.a.(3) Routine inspection of levels for those tanks not having control devices.

V.A.3.b. The Permittee shall prepare daily log sheets to record, where applicable, the following inspection information for all tanks and related vessels as required by LAC 33:V.1911.A, such as:

V.A.3.b.(1) The results of the visual inspection of all tanks and associated piping, valves, fittings, instruments, and vent control and relief systems.

V.A.3.b.(2) The results of the visual inspection of the containment areas for leaks, cracks, or spills as well as the dikes or containment wall for structural integrity.

V.A.3.c. The Permittee shall not place hazardous wastes or treatment reagents in the tank systems if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail, as evidenced by frequent maintenance and repair as required by LAC 33:V.1909.A. Such evidence must be corrected as required by LAC 33:V.1913.

V.A.3.d. The Permittee must respond to any leaks or spills as required by LAC 33:V.1913. If any spilled material or material collected/trapped in sumps is a hazardous waste, it must be managed in accordance with LAC 33:V.1505.C.3. Permittee shall note that if the collected material is discharged through a point source to United States waters or to a Public Owned Treatment Works, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it shall be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

V.A.3.e. All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

V.A.3.f. The Permittee shall not store wastes which are incompatible with the tank materials of construction which would cause accelerated rates of corrosion as evidenced by frequent maintenance and repair. Such evidence must be corrected as required by LAC 33:V.1909.

V.A.3.g. The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information and reports (via the April 2001 Part B Permit Renewal Application and subsequent application revisions and addendums) that were submitted to and approved by the administrative authority.

V.A.3.h. The Permittee shall, upon request, identify all 90-day accumulation tanks or containers, which contain or make contact with hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1747 to 1767.

V.A.4. Closure

The Permittee shall, upon closure of a tank system, remove all hazardous waste and hazardous waste residues as specified in the Closure Plan (Attachment 1). The Permittee shall also remove or decontaminate all waste residues from contaminated system components, contaminated soils, and contaminated structures and equipment and manage them as hazardous waste, unless they do not meet the definition of hazardous waste, as required by LAC 33:V.1915, LAC 33:V.Chapters 35 and 37.

V.A.5. Response to Leaks And/Or Spills

V.A.5.a. The Permittee must assess the results of a leak test or other tank integrity examination inspection as required by LAC 33:V.1903.

V.A.5.b. The Permittee must respond to any leaks or spills as required by LAC 33:V.1913.A, B, and C.

V.A.5.c. Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed as a hazardous waste must be cleaned up in a timely manner as required by LAC 33:V.1505.C.3.

V.A.5.d. Any release to the environment from a leak or spill must be reported as required by LAC 33:V.1913.D.

V.A.5.e. Provisions must be made for secondary containment, repair or closure, and any necessary repair certifications, as required by LAC 33:V.1913.E and F.

V.A.5.f. In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions (LAC 33:V.1913):

V.A.5.f.(1) Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.

V.A.5.f.(2) Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the

system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Administrative Authority and demonstrate that the longer time period is required. If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of LAC 33:V.1505.C.3. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters to a POTW, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I. Chapter 39, and 40 CFR Part 302.

V.A.5.f.(3) Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

V.A.5.f.(4) Close the system in accordance with the Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2. through E.3 are satisfied.

V.A.5.f.(4)(i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

V.A.5.f.(4)(ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

V.A.5.f.(4)(iii) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of LAC 33:V.1907.

V.A.5.f.(4)(iv) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.5.f.(5) For all major repairs to eliminate leaks or restore the integrity of the tank system, in accordance with LAC 33:V.1913.F, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

V.A.6. Recordkeeping and Reporting

V.A.6.a. The Permittee shall report to the administrative authority within twenty-four (24) hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment (LAC 33:V.1913.D).

V.A.6.b. Within thirty (30) days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information (LAC 33:V.1913.D.3) to the administrative authority:

V.A.6.b.(1) likely route of migration of the release;

V.A.6.b.(2) characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

V.A.6.b.(3) results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time schedule, the Permittee should provide the administrative authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires;

V.A.6.b.(4) proximity of downgradient drinking water, surface water, and populated areas; and

V.A.6.b.(5) description of response actions taken or planned.

V.A.6.c. The Permittee shall submit to the administrative authority all certifications of major repairs to correct leaks within seven (7) days from returning the tank system to use (LAC 33:V.1913.F and LAC 33:V.513).

V.A.6.d. The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation and testing of new tank systems. (LAC 33:V.1905.A, C, D, E, F, and LAC 33:V.513).

V.A.6.e. The Permittee shall keep on file at the facility the written assessment of the existing tank system's integrity (LAC 33:V.1903 and 513).

V.A.6.f. The Permittee must maintain records that meet LAC 33:V.1765.B requirements for tanks using air emission control devices.

V.A.7. Post-Closure

The Permittee will attempt to clean close all tank system units. If the facility cannot be clean closed, the Permittee shall present a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. CONTAINER STORAGE

The permit conditions as set forth under this section shall apply where applicable, to the permitted container storage facilities as designated in Section IV.B.

V.B.1. The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.

V.B.2. The Permittee shall maintain all containers in accordance with LAC 33:V.2103.

V.B.3. The Permittee will assure the integrity of the containers in accordance with LAC 33:V.2105.

V.B.4. The Permittee must manage the containers in accordance with LAC 33:V.2107.A and B.

V.B.5. The Permittee must inspect the containers and containment areas in accordance with LAC 33:V.2109.A, B, C and LAC 33:V.1509. Results of such inspections must be placed in the operating log. All incidents involving leaking containers and spilled materials reportable under applicable regulations (CWA, RCRA, SARA) shall be detailed in the annual report.

V.B.6. The Permittee must maintain the containment storage area as required by LAC 33:V.2111.A, B.1, 2 and 3.

V.B.7. The Permittee must manage spilled or leaked waste and accumulated precipitation according to LAC 33:V.2111.B.5.

V.B.8. The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Storm water shall be contained until analysis establishes that it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal methods.

V.B.9. The Permittee must place and store incompatible, ignitable, and reactive waste only in accordance with LAC 33:V.2115.A, B, C, D and LAC 33:V.1517.

V.B.10. The Permittee shall store hazardous waste (where applicable) on pallets not more than two (2) containers high and no more than four (4) large containers per tier on the pallet (more than four (4) small containers and lab packs may be stored on each pallet) and conform to LAC 33:V.2109.B. The pallets will be placed in rows with a minimum two (2) feet of aisle space between rows.

V.B.11. The Permittee must maintain those records and documents required by LAC 33:V.1513 and 1529 for the implementation of the contingency plan for this container storage area.

V.B.12. The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.

V.B.13. The Permittee must control and report all point source discharges according to LAC 33:V.1505.

V.B.14. All trucks containing hazardous waste shall be managed only in areas designed and utilized for managing such vehicles. These areas must meet the requirements of LAC 33:V.1527 and LAC 33:V.2111.

V.B.15. Spilled or leaked waste shall be removed in a timely manner as required by LAC 33:V.2111.B.5.

V.B.16. A representative sample of the hazardous waste in the tank truck must be analyzed in accordance with the Waste Analysis Plan to verify pertinent information on the manifest.

V.B.17. The quantity of waste received must be recorded and chemical and physical characteristics identified with regard to ignitability, reactivity, and incompatibility as required by LAC 33:V.2113 and 2115.

V.B.18. All solid hazardous waste shall be stored separate from the liquid hazardous waste or clearly designated as solid hazardous waste. Liquid containment capacity shall be readily determined by visual inspection.

V.B.19. The Permittee shall not exceed the maximum liquid capacity listed under Part IV, Section B, of this permit for each container storage area listed.

V.B.20. At closure, the Permittee must remove all hazardous waste, residues, and containers from the container storage area. All containers and liners must be handled as a hazardous waste (unless meeting the definition of empty). All residuals and contaminated soils must be removed as required by the Closure Plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117. If the facility cannot be clean closed, the Permittee shall present a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

V.B.21. The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.

V.B.22. The Permittee shall comply with the applicable requirements under LAC 33:V.1747 to 1767 for each container/container storage area listed in Table 8.

V.B.23. The pollution control methods used for containers shall be inspected on a periodic basis as listed in Inspection Plan referenced in Attachment 1 of this permit.

V.B.23.a. Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.

V.B.23.b. Level 2 controls shall be inspected in accordance with LAC 33:V.1759.D.4.

V.B.23.c. Level 3 controls shall be inspected in accordance with LAC 33:V.1759.E.4.

V.B.24. Container storage areas using Level 3 controls must meet LAC 33:V.1765.D requirements.

Table 8
Emission Controls for Containers

Container/Container Storage Area Identification	LAC Reference(s)	Air Emission Controls
Covered Warehouse	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Truck Loading and Unloading Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Incinerator Ash Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls

V.C. INCINERATOR

The Multipurpose Rotary Kiln Incinerator is subject to the Permittee's Clan Air Act Title V Permit 2718-V2, issued July 19, 2007 and any revisions made to the Title V Permit 2718-V2. In addition, the Permittee must abide by 40 CFR 63 Subpart EEE and the provisions listed below.

V.C.1. Permitted and Prohibited Wastes

V.C.1.a. The Permittee may burn, in the Multi-Purpose Rotary Kiln unit, only the hazardous wastes within the limits listed in this permit (See the Part A Application portion of this permit document).

V.C.1.b. Burning, in the Multi-Purpose Rotary Kiln Unit, of the wastes not listed in this Permit is prohibited.

V.C.1.c. Prohibited wastes which are not to be burned in the Multi-Purpose Rotary Kiln Unit include as a minimum the following:

V.C.1.c.(1) Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in LAC 33:V.4901.B;

V.C.1.c.(2) Polychlorinated biphenyl (PCB) waste 50 ppm or greater, as defined in 40 CFR Part 761.3;

V.C.1.c.(3) Radioactive or nuclear waste material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV;

V.C.1.c.(4) Explosive material, as defined by the Department of Transportation under 49 CFR

Part 173;

V.C.1.c.(5) Containerized gases;

V.C.1.c.(6) Municipal waste;

V.C.1.c.(7) Infectious wastes/Medical wastes as defined in 40 CFR 60.51.c;

V.C.1.c.(8) Metal bearing wastes listed in LAC 33:V. Chapter 22, Table 12, except as described in 2207.C;

V.C.1.c.(9) Wastes displaying the Characteristic of Reactivity as defined in LAC 33:V.4903.D.3, 7 and 8;

V.C.1.c.(10) Wastes from off-site CERCLA (Superfund) sites under remediation; or

V.C.1.c.(11) any listed waste (listed in either LAC 33:V.Chapter 31, Table 1 or LAC 33:V.Chapter 49) in concentrations greater than 100 ppm with a heat of combustion less than that of carbon tetrachloride (0.24 calories/gram or 432 BTU/lb).

V.C.1.d. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a modification to the permit as required under LAC 33:V.321.

V.C.2. Closure

The Permittee will close this facility according to LAC 33:V.3121 and the Closure Plan referenced in Attachment 1.

V.D. RISK-BASED CONDITIONS (Reserved)

VI. GROUND WATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 25, 27, 29, 30, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental

Quality Act, R.S. 30:2001 et seq., and the provisions of this section shall apply to ground water protection programs for facilities that are used to treat, store and dispose hazardous wastes at Syngenta Crop Protection, Inc., St Gabriel, Louisiana. No active regulated units are identified in this permit which are, at the time of issuance of this Permit, subject to Ground Water monitoring.

VI.B. Permittee shall comply with the monitoring, response and corrective action program provisions for the existing and any new systems in accordance with LAC 33:V. Chapter 33 and as outlined in this permit (i.e., Section VII, HSWA).

VI.C. If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the permittee shall establish, expand or continue, assessment and corrective action programs in accordance with the requirements of LAC 33:V. Chapter 33 and as subsequently directed by the Administrative Authority.

HAZARDOUS AND SOLID WASTE AMENDMENTS

VII. SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA

VII.A. DEFINITIONS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Administrative Authority" means the Louisiana Department of Environmental Quality (LDEQ).

"Application" refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

"Area of Concern" (AOC) means any discernable unit or area which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"CMS" means Corrective Measures Study.

"CWA" means Clean Water Act.

"EPA" means the United States Environmental Protection Agency.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous constituent" means any constituent identified in LAC 33:V.Chapter 31 Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

"LDEQ" means the Louisiana Department of Environmental Quality.

"Operating record" means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing or other data as may be required to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.b.

"Permittee" means Syngenta Crop Protection, Inc, Highway 75, St Gabriel, Louisiana

~~70068.~~

~~**"RCRA Permit"** means the full permit, with RCRA and HSWA portions.~~

~~**"RFA"** means RCRA Facility Assessment.~~

~~**"RFI"** means RCRA Facility Investigation.~~

~~**"Release"** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).~~

~~**"SARA"** means Superfund Amendments and Reauthorization Act of 1986.~~

~~**"Solid Waste Management Unit" (SWMU)** means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.~~

~~**"Stabilization"** is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long term remedies are pursued.~~

~~If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.~~

~~VII.B. STANDARD CONDITIONS~~

~~VII.B.1. Waste Minimization~~

~~Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or disposal that is a practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following are suggested criteria for the program:~~

~~**VII.B.1.a.** Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;~~

~~**VII.B.1.b.** Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;~~

~~**VII.B.1.c.** An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;~~

~~**VII.B.1.d.** Factors that have prevented implementation of source reduction and/or recycling;~~

~~**VII.B.1.e.** Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);~~

~~**VII.B.1.f.** An investigation of additional waste minimization efforts which could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;~~

~~**VII.B.1.g.** A flow chart or matrix detailing all hazardous wastes it produces by quantity, type, and building/area;~~

~~**VII.B.1.h.** A demonstration of the need to use those processes which produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste.~~

~~**VII.B.1.i.** A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed.~~

~~**VII.B.1.j.** A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.~~

~~**VII.B.2. Dust Suppression**~~

~~Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.~~

~~**VII.B.3. Permit Modification**~~

~~The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time, may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.~~

~~**VII.B.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit**~~

~~This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.~~

~~**VII.B.4.a.** If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C.3 or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.~~

~~**VII.B.4.b.** The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.33.321.C shall be followed.~~

~~**VII.B.4.c.** Modifications of this Permit do not constitute a reissuance of the Permit.~~

~~VII.B.5. Permit Review~~

~~This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as in accordance with LAC 33:V.321. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.~~

~~VII.B.6. Compliance with Permit~~

~~Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:~~

~~VII.B.6.a. Become effective by statute;~~

~~VII.B.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or~~

~~VII.B.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, CQA programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.~~

~~VII.B.7. Specific Waste Ban~~

~~VII.B.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V.Chapter 22 after the effective date of the prohibition unless the administrative authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.~~

~~VII.B.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205.A.2 including, but not limited to, clearly marking each tank or container.~~

~~VII.B.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the waste analysis plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.~~

~~VII.B.7.d. The Permittee shall perform a waste analysis at least annually or when a process changes, to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record.~~

~~VII.B.7.e. The Permittee must comply with requirements restricting placement of hazardous wastes in or on land which become effective by statute or promulgated under LAC 33:V.Chapter 22, regardless of requirements in the Permit. Failure to comply with the regulations may subject the Permittee to enforcement action under Section 3008 of RCRA and the Louisiana Environmental Quality Act, La. R.S. 30:2001 et.seq.~~

~~VII.B.8. Information Submittal~~

~~Failure to comply with any condition of the Permit, including information submittal, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).~~

~~The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required in this Permit are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. A summary of the planned reporting requirements pursuant to this Permit is found in Attachment 1. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:~~

~~Louisiana Department of Environmental Quality~~
~~Office of Environmental Services~~
~~602 N. Fifth Street~~
~~Baton Rouge, LA 70802~~

~~VII.B.9. Plans and Schedules Incorporated Into Permit~~

~~All plans and schedules required by this Permit are, upon approval by the~~

~~Administrative Authority, incorporated into this Permit by reference and become an enforceable part of this Permit. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action under Section 3008 of RCRA which may include fines, suspension, or revocation of the Permit.~~

~~Any noncompliance with approved plans and schedules shall be termed noncompliant with this Permit. Written requests for extensions of due dates for submittals may be granted by the Administrative Authority in accordance with LAC 33:I.1505.E.~~

~~If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this Permit according to procedures in LAC 33:V.321.~~

~~VII.B.10. Data Retention~~

~~All raw data, such as laboratory reports, drilling logs, bench scale or pilot scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.~~

~~VII.B.11. Management of Wastes~~

~~All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. Until such time as final regulations are adopted, proposed regulations under Subpart S – Corrective Action for Solid Waste Management Units – 40 CFR 264.550, 264.551 and 264.552, Federal Register, Friday, July 27, 1990, pp 30798-30884, or updated versions thereof acceptable to the administrative authority, shall be applicable as guidance for managing these wastes. Approval of units for managing wastes and conditions for operating the units, if approved, shall be granted through the permitting process.~~

~~VII.C. SPECIFIC CONDITION – CLOSURE~~

~~Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:~~

~~VII.C.1.~~ ~~Other than consolidation of any wastes from the sites in conformance with~~

~~LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;~~

~~**VII.C.2.** The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and~~

~~**VII.C.3.** The Permittee shall notify the Administrative Authority in writing at least 60 days prior to commencement of closure.~~

~~VII.D. SPECIFIC CONDITIONS PRELIMINARY REPORT~~

~~Within 90 days of notification of a newly discovered release of a hazardous waste or hazardous constituents, the Permittee shall submit to the Administrative Authority a Preliminary Report describing the current conditions at the facility. The Preliminary Report shall cover background information and current conditions at the facility for the items listed below.~~

~~VII.D.1. Facility Background~~

~~The Permittee report shall summarize the regional location, pertinent boundary features, general facility physiography, hydrogeology, and historical use of the facility for the treatment, storage or disposal of solid and hazardous waste. The Permittee's report shall include:~~

~~**VII.D.1.a** Map(s) depicting the following information. All maps depicting the following information shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current and future work performed at the site;~~

~~**VII.D.1.a.i** General geographic location;~~

~~**VII.D.1.a.ii** Property lines with the owners of all adjacent property clearly indicated;~~

~~**VII.D.1.a.iii** Topography with a contour interval of five (5) or ten (10) feet, a scale of 1 inch: 100 feet, waterways, all wetlands, floodplains, water features, drainage patterns;~~

~~**VII.D.1.a.iv** All solid waste management units;~~

~~**VII.D.1.a.v** All known past solid or hazardous waste treatment, storage or disposal areas regardless of whether they were active on November 19,1980;~~

~~**VII.D.1.a.vi** Surrounding land uses (e.g., residential, commercial, agricultural, and recreational); and~~

~~**VII.D.1.a.vii** The location of all production and groundwater monitoring wells with the well clearly labeled and ground and top of casing elevations included (ground and top of casing elevations may be included as an attachment).~~

~~**VII.D.1.b** A history and description of ownership and operation, solid and hazardous waste generation, treatment, storage and disposal activities at the facility;~~

~~**VII.D.1.c** Approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.~~

~~**VII.D.2 Nature and Extent of Contamination**~~

~~The Permittee shall include in the Preliminary Report the existing information on the nature and extent of contamination.~~

~~**VII.D.2.a** The Permittee's report shall summarize all possible source areas of contamination. This, at a minimum, should include all solid waste management units. For each area, the Permittee shall identify the following:~~

~~**VII.D.2.a.i** Location of unit/area (which shall be depicted on a facility map);~~

~~**VII.D.2.a.ii** Quantities of solid and hazardous wastes;~~

~~**VII.D.2.a.iii** Hazardous waste or hazardous constituents, to the extent known; and~~

VII.D.2.a.iv Identification of areas where additional information is necessary.

VII.D.2.b The Permittee shall prepare an assessment and description of the existing degree and extent of contamination. This should include:

VII.D.2.b.i Available monitoring data and qualitative information on locations and levels of contamination at the facility;

VII.D.2.b.ii All potential migration pathways including information on geology, pedology, hydrogeology, physiography, hydrology, water quality, meteorology, and air quality; and

VII.D.2.b.iii The potential impact(s) on human health and the environment, including demography, groundwater and surface water use, and land use.

V.D.3. PRELIMINARY REPORT REVIEW AND SITE ASSESSMENT

Within 120 days, the administrative authority shall review the preliminary report and issue a site assessment report detailing Solid Waste Management Units recognized by the administrative authority. Further investigations and corrective measures shall be accomplished according to the schedule outlined in Table 1, RFI and CMS Summary.

VII.E. SPECIFIC CONDITION INFORMATION REPOSITORY [RESERVED]

VII.F. BIF RULE [RESERVED]

VII.G. AA-BB AIR REGULATIONS

The Permittee must comply with the requirements of LAC 33:V.Chapter 17, as applicable. If the following information was not included in the Part B Permit

Application pursuant to LAC 33:V.Chapter 17.Subchapter A and Subchapter B, within 90 days of the effective date of this Permit, the Permittee shall submit to the Administrative Authority a report covering those units subject to LAC 33:V.Chapter 17 which must contain, at minimum, the following information:

VII.G.1. An equipment list which includes all the information required under LAC 33:V.1743.B.1 for equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight, and a list of all process vents associated with distillation, fractionation, thin film evaporation, solvent extraction, or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 percent by weight.

VII.G.2. For the process vents listed above, the amount of vent emissions in lb/hr or kg/hr, and in lb/yr or kg/yr.

VII.G.3. If the emissions in Section VII.G.2 exceed the emission limits cited in LAC 33:V.1707.A.1, the report must detail the manner in which compliance will be obtained, i.e., by the reduction of total organic emissions to the limits in LAC 33:V.1707.A.1 or reduction by means of a control device per LAC 33:V.1707.A.2.

VII.G.4. If a closed vent system and control device is installed to comply with the requirements in LAC 33:V.1707.B, provide the following information:

VII.G.4.a. An implementation schedule that includes dates by which the closed vent system and control device will be installed and in operation per LAC 33:V.1709.A.2.

VII.G.4.b. The type of control device under LAC 33:V.1709 to be installed (e.g., vapor recovery, flare, etc.).

VII.G.5. If the Permittee feels any of the requirements of this Permit Condition VII.G, or of LAC 33:V.Chapter 17 are not applicable to this facility, the Permittee must provide justification for this decision as part of the report.

VII.H. CORRECTIVE ACTION

VII.H.1. Corrective Action for Releases: Section 3004(u) of RCRA, as amended by HSWA, and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any SWMU at the facility, regardless of when the waste was

placed in the unit.

VII.H.2. Action Levels

VII.H.2.a. Applicability - The concept of action levels, described in the RFI guidance document referenced in Permit Condition VII.M.1.c.1 shall be used by the Permittee to determine the need for further corrective actions under this Permit. As specified in Permit Condition VII.Q, the Permittee shall conduct a CMS whenever concentrations of hazardous constituents in groundwater, surface water, soils, or air exceed action levels for any environmental medium; or when the Administrative Authority determines that concentrations of contaminants, even if below action levels, present a threat to human health or the environment. The concept of action levels is not the same as cleanup levels, although in some cases a final cleanup level may be set to equal the action level.

VII.H.2.b. Calculation - The Permittee shall adhere to RFI guidance in the calculation of action levels for all the environmental media. These action levels shall be updated as new toxicity data and promulgated standards (e.g., maximum contaminant levels) are derived. The most recent reference doses, reference concentrations, and cancer slope factors (e.g., data found in EPA's Integrated Risk Information System) shall be utilized in the calculation of action levels. The toxicity data available at the time that a determination for further action is made (i.e., requirement to conduct a CMS), including interim measures, shall be utilized in the calculations. If used as final cleanup levels, action levels shall be calculated using the most recent toxicity data and promulgated standards existing at the time of implementation of corrective measures.

VII.H.3. Risk Assessment

VII.H.3.a. The Permittee shall conduct human health and ecological risk assessments as necessary for the protection of human health and the environment. These risk assessments shall be used to establish baseline risk at a site and/or to derive final or interim cleanup levels at the site. These risk assessments, if necessary, shall be performed concurrently with the corrective action activities specified in this Permit, including any activities undertaken during implementation of the activities proposed in the RFI Workplan. These risk assessments may also be performed concurrently with the RFI Final Report and Summary and the CMS Phase of this permit, as specified in Permit Condition VII.O and VII.Q, R, and S respectively, but only after the Permittee has determined the full vertical and horizontal

extent of contamination at each respective SWMU.

VII.H.3.b. The Permittee shall utilize, but not be limited to, the following EPA documents and publications: "Compendium of ORD and OSWER Documents Relevant to RCRA Corrective Action" (EPA530-B-92-003, April 1992); "Ecological Assessments of Hazardous Waste Sites, A Field and Laboratory Reference Document" (EPA/600/3-89/013, March 1989); "ECO Update, Ecological Assessment of Superfund Sites: An Overview" (Publication 9345.0-05I, Vol. 1, No. 2, December 1991); and "ECO Update, Developing A Work Scope for Ecological Assessments" (Publication 9345.0-05I, Vol. 1, No. 4, May 1992); including any subsequent revisions.

VII.H.3.c. Baseline Risk Assessments - Baseline risk assessments, if required, shall be used to evaluate the risks posed by contaminants at a site prior to the beginning of any corrective actions. This type of risk assessment shall be used in certain circumstances (specified in Permit Condition VII.H.3.) instead of action levels (described in Permit Condition VII.H.2) to determine the need for remedial action.

VII.H.3.d. Although the action level concept shall serve as a trigger for a CMS (as specified in Permit Condition VII.O) certain exceptions will apply, but not be limited to the following circumstances. In cases where the applicable action levels are not protective enough of sensitive environmental systems; such as wetlands, estuaries, and habitats of endangered or threatened species, the Permittee shall conduct a baseline environmental risk assessment. In cases where there are confirmed releases to groundwater, surface water, air, or sediments, a baseline risk assessment shall be required to determine the need for stabilization/interim measures, especially where health advisories have been issued by local/state governments. In addition, action levels may be inappropriate at a site where there are multiple contaminants or where leaching from contaminated soils into groundwater poses greater risk than ingestion of the soils.

VII.H.3.e. If an action level has been exceeded, for any of the environmental media of concern, at any time during the corrective action activities required by this Permit, the Permittee may be required to conduct a risk assessment to determine risks to human health and the environment and the necessity to perform interim measures, as specified in Permit Condition VII.L. Risk assessments to determine final cleanup levels or to be used in justifying no further action determinations shall be

conducted only after the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or groups of SWMUs specified in this permit.

VII.H.3.f. Risk Assessments for Deriving Cleanup Levels - Risk assessments, if required, may also be used as a starting point for cleanup goals, in addition to the final cleanup level. Risk assessments may be required as specified in Permit Condition VII.H.3. In addition, where cleanup levels fail to incorporate significant routes of exposure at a particular site, or where remedies cannot meet the 10^{-4} to 10^{-6} risk range for carcinogens or meet action levels if chosen as final cleanup levels, a risk assessment may also be required.

The Administrative Authority intends to review risk assessments as part of the CMS Phase of the corrective action activities specified in this Permit in deriving final cleanup goals, but only after the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or groups of SWMUs specified in this permit.

VII.H.3.g. Use of Risk Assessments in Justifying No Further Action - The Permittee may submit a risk assessment(s) justifying no further action at a SWMU(s) concurrently with submittal of the RFI Final Report and Summary specified in Permit Condition VII.O, only if the Permittee has determined the full vertical and horizontal extent of contamination from each SWMU or group of SWMUs specified in this Permit.

VII.H.4. Corrective Action for Releases Beyond Facility Boundary: Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3222.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VII.H.5. Financial Responsibility: Assurances of financial responsibility for corrective action shall be provided as specified in the Permit following major modification for remedy selection.

VII.H.6. Summary of Corrective Action Activities: A summary of the corrective action activities associated with the facility is provided in Appendix One of Section VII of this permit. AOC's and SWMU's that are currently being managed or proposed for management under a prescribed corrective action

program (i.e. groundwater order, corrective action order, CERCLA) are identified in Section VII, Table 3 of this permit.

VII.I. REPORTING REQUIREMENTS

VII.I.1. The Permittee shall submit, in accordance with Permit Condition VII.B.7, signed quarterly progress reports of all activities (i.e., RFI, CMS) conducted pursuant to the provisions of this Permit beginning upon notification by the Administrative Authority. These reports shall contain:

VII.I.1.a. A description of the work completed and an estimate of the percentage of work completed;

VII.I.1.b. Summaries of all findings, including summaries of laboratory data;

VII.I.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VII.I.1.d. Projected work for the next reporting period;

VII.I.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VII.I.1.f. Changes in key project personnel during the reporting period; and

VII.I.1.g. Summaries of all changes made in implementation during the reporting period.

VII.I.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports), drilling logs and laboratory data shall be made available to the Administrative Authority upon request.

VII.I.3. In addition to the written reports as required in Permit Condition VII.I.1. and I.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VII.J. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY IDENTIFIED SWMUs AND POTENTIAL AOCs

VII.J.1. The Permittee shall notify the Administrative Authority, in writing, of any newly identified SWMU(s) and potential AOCs (i.e., a unit or area not specifically identified during the RFA), discovered in the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than thirty (30) calendar days after discovery. The Permittee

shall also notify the Administrative Authority of any newly constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VII.J.1.a. The location of the newly identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs);

VII.J.1.b. The type and function of the unit;

VII.J.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VII.J.1.d. The period during which the unit was operated;

VII.J.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VII.J.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU or whether the AOC should be considered a SWMU.

VII.J.2. Based on the results of this notification the Administrative Authority will designate the newly identified AOC(s). Based on the results of this notification or investigation conducted according to Condition VII.J.1, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU(s) or AOC(s). If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for investigation of SWMU(s) or AOC(s) will be reviewed for approval

as part of the RFI Workplan or a new RFI Workplan under Permit Condition VII.M.3. The Permit will be modified according to LAC 33:V.321 to incorporate the investigation requirements for the newly identified SWMU(s) and potential AOC(s) identified pursuant to Permit Condition VII.J.1.

VII.J.3. Newly identified SWMU's and AOC's will be included in Section VII, Table 2 of this permit.

VII.K. NOTIFICATION REQUIREMENTS FOR NEWLY DISCOVERED RELEASES AT SWMU(s) AND AOC(s)

The Permittee shall notify the Administrative Authority in writing, no later than fifteen (15) calendar days after discovery, of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of groundwater monitoring, field investigation, environmental auditing, or other means. Such newly discovered releases may be from newly identified SWMUs or AOCs, newly constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the RFA, completed RFI, or investigation of an AOC(s), the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification. The Administrative Authority may require further investigation and/or interim measures for the newly identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the RFI Workplan or a new RFI Workplan under Permit Condition VII.M.3. The Permit will be modified according to Permit Condition VII.B.3 to incorporate the investigation, if required.

VII.L. INTERIM MEASURES

VII.L.1. If during the course of any activity initiated under this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and a written plan. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit.

VII.L.2. The Permittee may propose interim measures at any time. The proposal shall include a written plan and a schedule for implementation. Depending upon the nature of the interim measure, a permit modification may not be required.

VII.L.3. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VII.L.3.a. Time required to develop and implement a final remedy;

VII.L.3.b. Actual and potential exposure to human and environmental receptors;

VII.L.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

~~VII.L.3.d. The potential for further degradation of the medium in the absence of interim measures;~~

~~VII.L.3.e. Presence of hazardous wastes in containers that may pose a threat of release;~~

~~VII.L.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that have the potential to migrate to groundwater or surface water;~~

~~VII.L.3.g. Weather conditions that may affect the current levels of contamination;~~

~~VII.L.3.h. Risks of fire, explosion, or accident; and~~

~~VII.L.3.i. Other situations that may pose threats to human health and the environment.~~

~~VII.M.RFI WORKPLAN~~

~~VII.M.1. The RFI Workplan, if required for newly discovered releases as specified in Condition VII.K, shall be submitted to the Administrative Authority in accordance with VII.U.3 within 180 calendar days from the notification of the requirement to submit additional investigations for newly discovered releases. The RFI Workplan must address releases of hazardous waste or hazardous constituents to all media.~~

~~VII.M.1.a. The Workplan shall describe the objectives of the investigation and the overall technical and analytical approach to completing all actions necessary to characterize the direction, rate, movement, and concentration of releases of hazardous waste or hazardous constituents from specific units or groups of units, and their actual or potential receptors. The RFI Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the RFI.~~

~~The Scope of Work for a RCRA Facility Investigation (RFI) is in Permit Condition VII.U.~~

~~VII.M.1.b. The RFI Workplan shall describe sampling, data collection quality assurance, and data management procedures, including formats for documenting and tracking data and other results of investigations,~~

and health and safety procedures.

VII.M.1.c. Development of the RFI Workplan and reporting of data shall be consistent with the following EPA guidance documents or the equivalent thereof:

VII.M.1.c.(1) RCRA Facility Investigation Guidance Document (EPA 530/SW-89-031, May 1989);

VII.M.1.c.(2) RCRA Ground-Water Monitoring: Draft Technical Guidance (EPA/530-R-93-001, November 1992);

VII.M.1.c.(3) RCRA Groundwater Monitoring Technical Enforcement Guidance Document (OSWER 9950.1 September 1986); and

VII.M.1.c.(4) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 3rd Edition, November 1992, with revisions.

VII.M.2. After the Permittee submits the Workplan, the Administrative Authority will either approve, disapprove, or modify the Workplan in writing.

If the Administrative Authority approves the Workplan, the Permittee shall begin implementation of the plan within two weeks (14 days) of receipt of approval, and implement it according to the schedule contained in the plan. All approved workplans become incorporated into this Permit as per Permit Condition VII.B.9.

In the event of disapproval (in whole or in part) of the Workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the plan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified Workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the grounds for the exception within 10 days of receipt of the disapproval.

VII.M.3. The Administrative Authority shall review for approval as part of the RFI Workplan or as a new workplan any plans developed pursuant to Permit Condition J addressing further investigations of newly identified SWMUs or AOCs, or Permit Condition VII.K addressing new releases from previously identified SWMUs or AOCs.

VII.N. RFI IMPLEMENTATION

No later than fourteen (14) calendar days after the Permittee has received written approval from the Administrative Authority for the RFI Workplan, the Permittee shall implement the RFI according to the schedules and in accordance with the approved RFI Workplan and the following:

VII.N.1. The Permittee shall notify Administrative Authority at least 10 days prior to any field sampling, field testing, or field monitoring activity required by this Permit to give agency personnel the opportunity to observe investigation procedures and/or split samples.

VII.N.2. Deviations from the approved RFI Workplan which are necessary during implementation of the investigations must be approved by the Administrative Authority and fully documented and described in the progress reports and in the RFI Final Report.

VII.O. RFI FINAL REPORT AND SUMMARY

VII.O.1. The RFI implementation has been conducted in three Phases. A Revised Phase I RFI Report was submitted to LDEQ in August 1996. The Phase I included the eleven SWMUs listed in Appendix I. LDEQ approved the Phase I RFI Report in October 1997. The Revised Phase II RFI was submitted to LDEQ in August 1996. The Phase II included three SWMUs listed in Appendix I. In August 1997, the LDEQ approved the Phase II Report, including the Corrective Action Plan for Location 4. The Corrective Action Plan was implemented, and a final closure certification report was submitted to LDEQ. Syngenta is currently monitoring a network of monitoring wells. Once the constituent concentrations drop below risk-based levels for three consecutive years, Syngenta will petition the LDEQ for a No Further Action at This Time for Location 4. A Phase III RFI Report was submitted to LDEQ/EPA in August 1995. The Phase III included four SWMUs listed in Appendix I. One SWMU, the Pilot Plant Area, will require additional investigation. Once this has been completed, Syngenta will petition the LDEQ for a No Further Action at This Time for all Phase III SWMUs.

Within ninety (90) calendar days after the completion of the RFI, the Permittee shall submit an RFI Final Report and Summary. The RFI Final Report for Phase II and Phase III shall describe the procedures, methods, and results of all investigations as described in Permit Condition VII.U.5. This includes SWMUs and their releases, the type and extent of contamination at the facility, sources and migration pathways, action levels, and actual or potential receptors. The RFI Final Report for Phase II and Phase III shall present all information gathered under the approved RFI Workplan. The RFI Final Report for Phase II and Phase III must contain adequate information to support further corrective action decisions at the facility. The Summary shall

summarize the RFI Final Report for Phase II and Phase III.

For any newly discovered SWMU's and AOC's, within ninety (90) calendar days after the completion of the RFI, the Permittee shall submit an RFI Final Report and Summary. The RFI Final Report shall describe the procedures, methods, and results of all investigations as described in Permit Condition VII.U.5. This includes SWMUs and their releases, the type and extent of contamination at the facility, sources and migration pathways, action levels, and actual or potential receptors. The RFI Final Report shall present all information gathered under the approved RFI Workplan. The RFI Final Report must contain adequate information to support further corrective action decisions at the facility. The Summary shall summarize the RFI Final Report.

VII.O.2. After the Permittee submits the RFI Final Report and Summary, the Administrative Authority shall either approve or disapprove them in writing.

If the Administrative Authority approves the RFI Final Report and Summary, the Permittee shall mail the approved Summary to all individuals on the facility mailing list established pursuant to LAC 33:V.717.A.5, within thirty (30) calendar days of receipt of approval.

If the Administrative Authority determines the RFI Final Report and Summary do not fully meet the objectives stated in Permit Condition VII.M, the Administrative Authority may disapprove the RFI Final Report and Summary. If the Administrative Authority disapproves the report, the Administrative Authority shall notify the Permittee in writing of the report's deficiencies and specify a due date for submittal of a revised Final Report and Summary or the Administrative Authority shall modify the report before approval. Once approved, the summary shall be mailed to all individuals on the facility mailing list as specified above, unless the Permittee takes exception to the conditions of the approved report. If the Permittee takes exception to any portion of the report approved by the Administrative Authority, written notification of the exception(s) will be sent to the Administrative Authority.

VII.O.3. Action levels, as discussed in Permit Condition VII.H.2, shall be used by the Permittee to determine the need for further corrective action under this Permit. Action levels are one criterion which can be used to determine if a CMS is required. The concept of action levels is not the same as cleanup levels, although in some cases a final cleanup level may be set to equal the action level.

VII.P. DETERMINATION OF NO FURTHER ACTION

~~VII.P.1. Based on the results of the RFI and/or other relevant information, the Permittee may submit an application to the Administrative Authority for a Class III permit modification under LAC 33:V.321.C.3 to terminate the RFI/CMS process for a specific unit. This permit modification application must contain information demonstrating that there are no releases of hazardous waste including hazardous constituents from a particular SWMU at the facility that pose threats to human health and/or the environment, as well as additional information required in LAC 33:V.321.C.3.~~

~~If, based upon review of the Permittee's request for a permit modification, the results of the RFI, and other information, including comments received during the sixty (60) day public comment period required for Class III permit modifications, the Administrative Authority determines that releases or suspected releases which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.~~

~~VII.P.2. If necessary to protect human health or the environment, a determination of no further action shall not preclude the Administrative Authority from requiring continued or periodic monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.~~

~~VII.P.3. A determination of no further action shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to Permit LAC 33:V.321.~~

~~VII.P.4. The SWMU(s)/AOC(s) that have received no further action determinations from the Administrative Authority are identified in Section VII, Table 4 of this permit.~~

~~VII.Q. CMS PLAN~~

~~VII.Q.1. If the Administrative Authority has reason to believe that a SWMU has released concentrations of hazardous constituents, or if the Administrative Authority determines that contaminants present a threat to human health or the environment given action levels or site-specific exposure conditions, the Administrative Authority may require a CMS and shall notify the Permittee in writing. The notification may also specify remedial alternatives to be evaluated by the Permittee during the CMS.~~

~~VII.Q.2. The Permittee shall submit a CMS Plan to the Administrative Authority~~

~~within ninety (90) calendar days from notification of the requirement to conduct a CMS. The Scope of Work for a CMS Plan is in Permit Condition VII.V.~~

~~The CMS Plan shall provide the following information:~~

~~**VII.Q.2.a.** A description of the general approach to the investigation, and potential remedies;~~

~~**VII.Q.2.b.** A definition of the overall objectives of the study;~~

~~**VII.Q.2.c.** Specific plans for evaluating remedies to ensure compliance with remedy standards;~~

~~**VII.Q.2.d.** Schedules for conducting the study; and~~

~~**VII.Q.2.e.** The proposed format for the presentation of information.~~

~~**VII.Q.3.** After the Permittee submits the CMS Plan, the Administrative Authority will either approve, disapprove, or modify the plan in writing. If the Administrative Authority approves the CMS Plan, the Permittee shall implement the plan per Permit Condition VII.R.~~

~~In the event of disapproval (in whole or in part) of the CMS Plan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the plan to correct these within the time frame specified in the notice of deficiency. The modified CMS Plan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to the disapproval, decision, or directive, the Permittee shall submit a written statement of the grounds for the exception.~~

~~VII.R. CMS IMPLEMENTATION~~

~~No later than fourteen (14) calendar days after the Permittee has received written approval from the Administrative Authority for the CMS Plan, the Permittee shall begin implementation of the Corrective Measures Study and execute the plan according to the schedules specified and in accordance with the approved CMS Plan. All approved plans become incorporated into this Permit as per Permit Condition VII.B.9.~~

~~VII.S. CMS FINAL REPORT AND SUMMARY~~

~~**VII.S.1.** Within sixty (60) calendar days after the completion of the CMS, the Permittee shall submit a CMS Final Report and Summary. The Summary~~

~~shall summarize the Final Report. The CMS Final Report shall discuss the results of investigations of each remedy studied and of any bench scale or pilot tests conducted. It must include an evaluation of each remedial alternative. The CMS Final Report shall present all information gathered during the CMS, and must contain adequate information to support the remedy selection process. In the CMS Final Report, the Permittee shall propose a corrective action program that shall:~~

~~**VII.S.1.a.** attain compliance with corrective action objectives for hazardous constituents in each medium, as established in Permit Condition VII.V;~~

~~**VII.S.1.b.** control sources of releases;~~

~~**VII.S.1.c.** meet acceptable waste management requirements; and~~

~~**VII.S.1.d.** protect human health and the environment.~~

~~**VII.S.2.** After the Permittee submits the CMS Final Report and Summary, the Administrative Authority will either approve or disapprove them in writing. Should the Permittee take exception to the disapproval, decision, or directive, the Permittee shall notify the Administrative Authority.~~

~~If the Administrative Authority approves the CMS Final Report and Summary, the Permittee shall mail the approved Summary to all individuals on the facility mailing list established pursuant to LAC 33:V.717.A.5, within fifteen (15) calendar days of receipt of approval.~~

~~If the Administrative Authority determines the CMS Final Report and Summary do not fully meet the objectives stated in Permit Condition VII.V, the Administrative Authority may disapprove the CMS Final Report and Summary. If the Administrative Authority disapproves the Report, the Administrative Authority shall notify the Permittee in writing of the Report's deficiencies and specify a due date for submittal of a revised Final Report and Summary. Once approved, the Summary shall be mailed to all individuals on the facility mailing list as specified above.~~

~~**VII.S.3.** Based on preliminary results and the CMS Final Report, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.~~

~~VII.T. CORRECTIVE MEASURE (REMEDY) SELECTION AND IMPLEMENTATION~~

~~Within thirty (30) calendar days after approval of CMS Final Report and Summary, the Administrative Authority shall initiate modification of the Permit according to LAC~~

~~33:V.321, for corrective measure (remedy) selection, based on the approved CMS Final Report. The resultant modified permit will include schedules for remedy implementation.~~

~~VII.U. RFI SCOPE OF WORK~~

~~VII.U.1. Purpose~~

~~The purpose of the RFI is to determine the nature and extent of releases of hazardous wastes or hazardous constituents from solid waste management units. The required information shall include each item specified under Tasks I-III. The Permittee shall furnish all personnel, materials, and services necessary for, or incidental to, performing the RFI.~~

~~If the Permittee believes that certain requirements of the Scope of Work are not applicable, the specific requirements shall be identified and a detailed rationale for inapplicability shall be provided.~~

~~VII.U.2. Scope~~

~~The RFI consists of three tasks:~~

~~Task I: RFI Workplan~~
- ~~a. Introduction~~
- ~~b. Environmental Setting~~
- ~~c. Source Characterization~~
- ~~d. Contamination Characterization~~
- ~~e. Potential Receptor Identification~~
- ~~f. Data Collection Quality Assurance Plan~~
- ~~g. Data Management Plan~~
- ~~h. Health and Safety Plan~~
- ~~i. Community Relations Plan~~
- ~~j. Project Management Plan~~

~~Task II: RCRA Facility Investigation~~

~~Task III: RFI Final Report and Summary~~

~~VII.U.3. Task I: RFI Workplan~~

~~The Permittee shall prepare a RFI Workplan as specified in Permit Condition VII.M and the following. The RFI Workplan shall provide for and address the following information needs:~~

~~VII.U.3.a. Introduction~~

~~VII.U.3.a.(1) Facility Description~~

~~The introduction shall summarize the regional location, pertinent boundary features, general facility physiography, hydrogeology, and historical use of the facility for the treatment, storage, or disposal of solid and hazardous waste. Information from existing reports and studies is acceptable, as long as the source of this information is documented, pertinent, and reflective of current conditions. This section shall include:~~

~~**VII.U.3.a.(1)(i)** Map(s) depicting the information specified below. All maps shall be consistent with requirements set forth in LAC 33:V.517 and shall be of sufficient detail and accuracy to locate all current and future work performed at the site.~~

~~**VII.U.3.a.(1)(i)(1)** general geographic location;~~

~~**VII.U.3.a.(1)(i)(2)** property lines, with the owners of all adjacent property clearly indicated, and all land previously owned and/or used by the Permittee around the facility;~~

~~**VII.U.3.a.(1)(i)(3)** topography, waterways, wetlands, floodplains, water features, and drainage patterns;~~

~~**VII.U.3.a.(1)(i)(4)** all tanks, buildings, utilities, paved areas, rights of way, and other features;~~

~~**VII.U.3.a.(1)(i)(5)** all solid waste management units;~~

~~**VII.U.3.a.(1)(i)(6)** all known past solid or hazardous waste treatment, storage and disposal areas or units regardless of whether they were active on November 19, 1980;~~

~~**VII.U.3.a.(1)(i)(7)** surrounding land uses (residential, commercial, agricultural, recreational); and~~

~~**VII.U.3.a.(1)(i)(8)** the location of all production and~~

~~groundwater monitoring wells. These wells shall be clearly labeled and ground and top of casing elevations included (these elevations may be included as an attachment).~~

~~**VII.U.3.a.(1)(ii)** A history and description of ownership and operation, solid and hazardous waste generation, treatment, storage and disposal activities at the facility.~~

~~**VII.U.3.a.(1)(iii)** A summary of approximate dates or periods of past waste releases, identification of the materials released, the amount released, the location released, and a description of the response actions conducted (local, state, or Federal response units, or private parties), including any inspection reports or technical reports generated as a result of the response.~~

~~**VII.U.3.a.(1)(iv)** A reference to all environmental, geologic, and hydrogeologic studies performed by all parties, at or near the facility, with a short summary of the purpose, scope, and significant findings thereof.~~

~~**VII.U.3.a.(1)(v)** A reference to all environmental permits, applied for and/or received, the purpose thereof, and a short summary of requirements.~~

~~**VII.U.3.a.(2) Nature and Extent of Contamination**~~

~~**VII.U.3.a.(2)(i)** The Introduction shall summarize all possible source areas of contamination. This, at a minimum, should include all SWMUs listed in Table 2. For each area, the Permittee shall identify the following:~~

~~**VII.U.3.a.(2)(i)(1)** location of unit/area on a facility map;~~

~~**VII.U.3.a.(2)(i)(2)** quantities of solid, hazardous, and radiochemical wastes;~~

~~**VII.U.3.a.(2)(i)(3)** quantities of radiochemical and hazardous constituents, to the extent known; and~~

~~**VII.U.3.a.(2)(i)(4)** identification of areas where additional~~

information is necessary.

VII.U.3.a.(2)(ii) The Permittee shall prepare an assessment and description of the existing degree and extent of contamination. This should include:

VII.U.3.a.(2)(ii)(1) available monitoring data and qualitative information on locations and levels of contamination at the facility;

VII.U.3.a.(2)(ii)(2) all potential migration pathways including information on geology, pedology, hydrogeology, physiography, hydrology, water quality, meteorology, and air quality; and

VII.U.3.a.(2)(ii)(3) the potential impact(s) on human health or the environment, including demography, groundwater and surface water use, and land use.

VII.U.3.a.(3) Implementation of Interim Measures

The Permittee shall document and report on all interim measures which have been or are being undertaken at the facility, including under state or Federal compliance orders, other than those specified in the Permit. The report shall include, as applicable:

VII.U.3.a.(3)(i) Objectives of the interim measures: how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long-term solution;

VII.U.3.a.(3)(ii) Schedules for design, construction and monitoring;

VII.U.3.a.(3)(iii) Schedule for progress reports;

VII.U.3.a.(3)(iv) Stabilization that has occurred at the site;

VII.U.3.a.(3)(v) Proposed further investigation and/or action; and

~~VII.U.3.a.(3)(vi) Justification for limiting the scope of the RFI.~~

~~VII.U.3.b. Environmental Setting~~

~~The Workplan shall provide for collection of information to supplement and verify existing information on the environmental setting at the facility. The Workplan shall provide for characterization of the following:~~

~~VII.U.3.b.(1) Hydrogeology~~

~~The Workplan shall describe in detail a program to evaluate hydrogeologic conditions at the facility. This program shall provide for least the following information needs:~~

~~VII.U.3.b.(1)(i) A description of the regional, local, facility wide, and SWMU specific geologic and hydrogeologic characteristics affecting groundwater flow beneath the facility.~~

~~VII.U.3.b.(1)(ii) An analysis of any topographic features including surface water bodies that might influence the groundwater flow system.~~

~~VII.U.3.b.(1)(iii) A representative and accurate classification and description of the hydrogeologic units which may be part of migration pathways at the facility (i.e., the aquifers and any intervening saturated and unsaturated units) based on field data, tests (e.g., gamma and neutron logging of existing and new wells, piezometers and borings), and cores.~~

~~VII.U.3.b.(1)(iv) The extent (depth, thickness, lateral extent) of hydrogeologic units which may be part of migration pathways based on field studies and cores, structural geology, and hydrogeologic cross sections, including:~~

~~VII.U.3.b.(1)(iv)(1) unconsolidated sand and gravel deposits;~~

~~VII.U.3.b.(1)(iv)(2) zones of fracturing or channeling in consolidated or unconsolidated deposits; and~~

~~VII.U.3.b.(1)(iv)(3) zones of high permeability or low permeability that might direct and restrict the flow of contaminants.~~

~~VII.U.3.b.(1)(v) A description of representative water level or fluid pressure based on data obtained from groundwater monitoring wells and piezometers installed upgradient and downgradient of the potential contaminant source. Information needs include: potentiometric surface maps; hydrologic cross sections showing vertical gradients; vertical and horizontal components of flow; temporal changes in hydraulic gradients; and flow nets.~~

~~VII.U.3.b.(1)(vi) A description of man made influences that may affect site hydrogeology such as active and inactive local water supply and production wells, pipelines, french drains, and ditches.~~

~~VII.U.3.b.(2) Soils~~

~~The Permittee shall describe in detail a program designed to characterize soil and rock units above the water table. Such characterization shall include, but is not limited to, the following information: surface soil distribution; soil profile, including American Society for Testing and Materials (ASTM) and Unified Soil Classification System (USCS) classifications of soils; transects of soil stratigraphy; saturated hydraulic conductivity; porosity; cation exchange capacity (CEC); soil pH; particle size distribution; depth to water table; moisture content; effect of stratification on unsaturated flow; infiltration; evapotranspiration; residual concentration of contaminants in soil; total natural organic carbon content; and mineral and metal content.~~

~~VII.U.3.c. Source Characterization~~

~~The Permittee shall describe in detail a program designed to completely characterize the wastes and the areas where wastes have been placed, including: type, quantity, physical form, composition, disposition (containment and nature of wastes), and the facility characteristics affecting releases (e.g., facility security, engineered barriers). This shall include quantification of the following specific characteristics, at each source area:~~

~~VII.U.3.c.(1) Unit/disposal area characteristics, including but not limited to: location of unit/disposal area; type of unit/disposal area; design features; operating practices (past and present); period of operation; age of unit/disposal area; general physical conditions; and method used to close the unit/disposal area;~~

~~VII.U.3.c.(2) Waste characteristics, including but not limited to: type of waste placed in unit (hazardous classification, quantity, chemical composition); physical and chemical characteristics (physical form, physical description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).~~

~~**VII.U.3.d. Contamination Characteristics**~~

~~The Permittee shall describe in detail a program to collect analytical data on groundwater, soils, surface water, sediment, and subsurface gas contamination when necessary to characterize contamination from a SWMU. The data shall be sufficient to define the extent, origin, direction, and rate of movement of contaminant plumes. Data required shall include time and location of sampling, media sampled, concentrations found, conditions during sampling, and the identity of the individual(s) performing the sampling and analysis. All media (groundwater, surface water and sediments, soil, air, and gas) unless otherwise specified in Table 2, must be investigated. If the Permittee believes certain media could not be affected by a release from a specific unit, a detailed justification for not investigating those media must be provided. The Permittee shall address the following types of contamination at the facility as appropriate:~~

~~**VII.U.3.d.(1) Groundwater Contamination**~~

~~The Workplan shall describe in detail a program of groundwater investigation to characterize any groundwater plumes of contamination at the facility that are not subject to corrective action requirements of LAC 33:V.3321. The program shall at a minimum provide for the following information needs:~~

~~VII.U.3.d.(1)(i) a description of the horizontal and vertical extent of~~

~~any immiscible or dissolved plume(s) originating from the facility;~~

~~**VII.U.3.d.(1)(ii)** the horizontal and vertical direction of contamination movement;~~

~~**VII.U.3.d.(1)(iii)** the velocity of contaminant movement;~~

~~**VII.U.3.d.(1)(iv)** the horizontal and vertical concentrations of any LAC 33:V.3325. Table 4 constituents [40 CFR 264 Appendix IX];~~

~~**VII.U.3.d.(1)(v)** an evaluation of factors influencing the plume movement; and~~

~~**VII.U.3.d.(1)(vi)** an extrapolation of future contaminant movement.~~

~~**VII.U.3.d.(2) Soil Contamination**~~

~~The Permittee shall describe in detail a program to characterize contamination of soil and rock units above the water table in the vicinity of the contaminant release. The program shall provide for the following information needs:~~

~~**VII.U.3.d.(2)(i)** a description of the vertical and horizontal extent of contamination;~~

~~**VII.U.3.d.(2)(ii)** a description of contaminant and soil chemical properties within the contaminant source area. This includes contaminant solubility, speciation, adsorption, leachability, exchange capacity, biodegradability, hydrolysis, photolysis, oxidation, natural total organic carbon content; and other factors that might affect contaminant migration and transformation.~~

~~**VII.U.3.d.(2)(iii)** plume migration and transformation; specific contaminant concentrations; the velocity and direction of contaminant movement; and an extrapolation to future contaminant movement.~~

~~**VII.U.3.d.(3) Surface Water and Sediment Contamination**~~

~~The Permittee shall describe in detail a program to~~

characterize contamination in surface water bodies and sediment resulting from contaminant releases at the facility. The investigation shall at minimum include the following:

VII.U.3.d.(3)(i) a description of the surface water body including location, elevation, flow, velocity, depth, width, seasonal fluctuations, flooding tendencies, drainage patterns, and evapotranspiration rates;

VII.U.3.d.(3)(ii) a description of sediment characteristics including depositional area, thickness, mineralogy, grain size, density, ion exchange capacity, and total natural organic carbon content;

VII.U.3.d.(3)(iii) maps for all areas included in surface water and sediment investigations which meet requirements in LAC 33:V.517 and which are sufficiently detailed and accurate to depict all the information required;

VII.U.3.d.(3)(iv) a description of the horizontal and vertical extent of any immiscible or dissolved plumes originating from the facility, and the extent of contamination in the underlying sediments;

VII.U.3.d.(3)(v) the horizontal and vertical direction and velocity of contaminant movement;

VII.U.3.d.(3)(vi) an evaluation of the physical, biological, chemical, and radiochemical factors influencing contaminant movement;

VII.U.3.d.(3)(vii) an extrapolation to future contaminant movement;

VII.U.3.d.(3)(viii) a description of the chemistry of the contaminated surface waters and sediments. This includes pH, temperature, total dissolved solids, total suspended solids, biochemical oxygen demand, alkalinity, conductivity, dissolved oxygen profiles, nutrients, chemical oxygen demand, total organic carbon, and specific contaminant concentrations.

VII.U.3.d.(4) Air Contamination

The Permittee shall describe in detail a program to

characterize particulate and gaseous contaminants released into the atmosphere. This investigation shall provide the following information: a description of the horizontal and vertical direction and velocity of contaminant movement; the rate and amount of the release; and the chemical, radiochemical, and physical composition of the contaminants released, including horizontal and vertical concentration profiles.

VII.U.3.d.(5) Subsurface Gas

The Permittee shall describe in detail a program to characterize the nature, rate and extent of releases of reactive gases from the units. Such a program shall include, but is not limited to: provisions for monitoring subsurface gases released from the unit, and an assessment of the potential for threat to human health and/or the environment.

VII.U.3.e. Potential Receptors

The Permittee shall describe in detail a program to collect data to describe human populations and environmental systems that are susceptible to contaminant exposure from the facility. Chemical and radiochemical analysis of biological samples may be needed. Data on observable effects in ecosystems may also be required. The following characteristics shall be identified:

VII.U.3.e.(1) Local uses and possible future uses of groundwater, including:

VII.U.3.e.(1)(i) type of use (i.e., potable, domestic, agricultural, residential, industrial, municipal)

VII.U.3.e.(1)(ii) location of all groundwater wells, names of owners or tenants at those locations, USGS/DODT well designations, and current use of those wells within a 1-mile radius of facility.

VII.U.3.e.(2) Local uses and possible future uses of surface waters within a 1.5 mile radius of the facility, including domestic and municipal, recreational, agricultural, industrial, and environmental.

VII.U.3.e.(3) Human use of or access to the facility and adjacent lands, including but not limited to recreation, hunting, residential,

~~commercial, and industrial.~~

~~VII.U.3.e.(4) A demographic profile of people who use or have access to the facility and adjacent land, including, but not limited to age, gender, and sensitive subgroups.~~

~~VII.U.3.e.(5) A description of the local ecology, including biota in surface water bodies on, adjacent to, or affected by the facility, and a description of any endangered or threatened species near the facility.~~

~~VII.U.3.f. Data Collection Quality Assurance Plan~~

~~The Permittee shall prepare a plan to document all monitoring procedures: sampling, field measurements, and sample analysis performed at the facility during the investigation to characterize the environmental setting, source, and contamination, so as to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented.~~

~~VII.U.3.f.(1) The strategy section of the Data Collection Quality Assurance Plan shall include but not be limited to the following:~~

~~VII.U.3.f.(1)(i) description of the intended uses for the data, and the necessary level of precision and accuracy for those intended uses;~~

~~VII.U.3.f.(1)(ii) description of methods and procedures to be used to assess the precision, accuracy and completeness of the measurement data; and~~

~~VII.U.3.f.(1)(iii) schedule and information to be provided in quality assurance reports, including at least:~~

~~VII.U.3.f.(1)(iii)(1) periodic assessment of measurement data accuracy, precision, and completeness;~~

~~VII.U.3.f.(1)(iii)(2) results of performance audits;~~

~~VII.U.3.f.(1)(iii)(3) results of systems audits; and~~

~~VII.U.3.f.(1)(iii)(4) significant quality assurance problems and~~

~~resolutions.~~

~~**VII.U.3.f.(2)** The Sampling and Field Measurements Section of the Data Collection Quality Assurance Plan shall at least discuss:~~

~~**VII.U.3.f.(2)(i)** selecting appropriate sampling and field measurements locations, depths, etc.;~~

~~**VII.U.3.f.(2)(ii)** providing a statistically sufficient number of sampling and field measurement sites;~~

~~**VII.U.3.f.(2)(iii)** determining conditions under which sampling or field measurements shall be conducted;~~

~~**VII.U.3.f.(2)(iv)** determining which parameters are to be measured and where;~~

~~**VII.U.3.f.(2)(v)** selecting the frequency of sampling and length of sampling period;~~

~~**VII.U.3.f.(2)(vi)** selecting the types of sample (e.g., composites vs. grabs) and number of samples to be collected;~~

~~**VII.U.3.f.(2)(vii)** delineating procedures designed to prevent contamination of sampling or field measurements equipment and cross contamination between sampling points;~~

~~**VII.U.3.f(2)(viii)** documenting field sampling operations and procedures;~~

~~**VII.U.3.f.(2)(ix)** selecting appropriate sample containers;~~
~~**VII.U.3.f.(2)(x)** preserving samples;~~

~~**VII.U.3.f.(2)(xi)** controlling chain of custody; and~~

~~**VII.U.3.f.(2)(xii)** disposing of all contaminated materials generated by activities in a manner compliant with all state and Federal regulations.~~

~~**VII.U.3.f.(3)** The Sample Analysis shall include:~~

~~**VII.U.3.f.(3)(i)** chain of custody procedures;~~

~~**VII.U.3.f.(3)(ii)** sample storage procedures and holding times;~~

~~VII.U.3.f.(3)(iii) sample preparation methods;~~

~~VII.U.3.f.(3)(iv) analytical procedures;~~

~~VII.U.3.f.(3)(v) calibration procedures and frequency;~~

~~VII.U.3.f.(3)(vi) data reduction, validation and reporting; and~~

~~VII.U.3.f.(3)(vii) frequency of internal quality control checks and laboratory performance audits.~~

~~VII.U.3.g. Data Management Plan~~

~~The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This plan shall identify and set up data documentation materials and procedures (data record), project file requirements, and project related progress reporting procedures and documents.~~

~~VII.U.3.g.(1) The data record shall include at least the following for all sample and field measurements: unique measurement code; measurement location; measurement type; laboratory ID number; property or component analyzed; and results of analysis.~~

~~VII.U.3.g.(2) The Data Management Plan shall provide the format to be used to present the data and conclusions of the investigation, etc.~~

~~VII.U.3.g.(2)(i) The following shall be presented in tables: raw data; data sorted by significant features such as location, media, constituent; data reduction for statistical analysis; and summary data.~~

~~VII.U.3.g.(2)(ii) The following shall be presented in graphical formats (e.g., bar graphs, line graphs, plan maps, isopleth plots, cross sections, three dimensional displays, etc.): sampling location and grid; levels of contamination at each sampling location; geographical extent of contamination; and changes in concentration relative to source, time, depth, and other parameters.~~

~~VII.U.3.h. Health and Safety Plan~~

~~VII.U.3.h.(1) The Permittee shall prepare a facility Health and Safety~~

Plan, which shall include:

VII.U.3.h.(1)(i) a description of the facility including availability of resources such as roads, water supply, electricity and telephone service;

VII.U.3.h.(1)(ii) a description of the known hazards and evaluation of the risks associated with each activity conducted, including but not limited to on and off site exposure to contaminants during implementation of interim measures;

VII.U.3.h.(1)(iii) a list of key personnel and alternatives responsible for site safety, response operations, and for protection of public health;

VII.U.3.h.(1)(iv) a delineation of the work area;

VII.U.3.h.(1)(v) a description of levels of protection to be worn by personnel in the work area;

VII.U.3.h.(1)(vi) procedures established to control site access;

VII.U.3.h.(1)(vii) decontamination procedures for personnel and equipment;

VII.U.3.h.(1)(viii) site emergency procedures;

VII.U.3.h.(1)(ix) emergency medical care procedures for injuries and toxicological problems;

VII.U.3.h.(1)(x) requirements for an environmental field monitoring program;

VII.U.3.h.(1)(xi) routine and special training requirements for responders; and

VII.U.3.h.(1)(xii) procedures for protecting workers from weather related problems.

VII.U.3.h.(2) The Facility Health and Safety Plan shall be consistent with:

VII.U.3.h.(2)(i) NIOSH Occupation Safety and Health Guidance Manual for Hazardous Waste Site Activities (1985);

VII.U.3.h.(2)(ii) EPA Order 1440.1 - Respiratory Protection;

~~**VII.U.3.h.(2)(iii)** EPA Order 1440.3 Health and Safety Requirements for Employees engaged in Field Activities;~~

~~**VII.U.3.h.(2)(iv)** approved Facility Contingency Plan;~~

~~**VII.U.3.h.(2)(v)** EPA Operating Safety Guide (1984);~~

~~**VII.U.3.h.(2)(vi)** OSHA regulations, particularly 29 CFR 1910 and 1926;~~

~~**VII.U.3.h.(2)(vii)**State and local regulations; and~~

~~**VII.U.3.h.(2)(viii)**other EPA guidance as provided.~~

~~**VII.U.3.i. Community Relations Plan**~~

~~The Permittee shall prepare a plan for dissemination of information to the public regarding investigation activities and results.~~

~~**VII.U.3.j. Project Management Plan**~~

~~The Permittee shall prepare a Project Management Plan that will include a discussion of the technical approach, schedules, budget, and key project personnel. The project management plan will also include a description of qualifications of key project personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the RFI.~~

~~VII.U.4. Task II: RCRA Facility Investigation~~

~~The facility investigation activities shall follow the RFI Workplan. All sampling and analyses shall be conducted in accordance with the Data Collection Quality Assurance Plan. All sampling locations shall be documented in a log and identified on a detailed site map. During the RFI, it may be necessary to revise the RFI Workplan to increase or decrease the detail of information collected to accommodate the facility specific situation.~~

~~The Permittee shall conduct investigations of SWMUs previously identified with known or suspected releases of contamination to characterize the facility (Environmental Setting), define the source (Source Characterization), define the degree and extent of contamination (Contamination Characterization), and identify actual or potential receptors.~~

~~The investigations should result in data of adequate technical quality to develop and evaluate corrective measures alternatives during the Corrective Measures Study, when necessary.~~

~~VII.U.5. Task III: RFI Final Report and Summary~~

~~The Permittee shall analyze all facility investigation data collected during the RFI process and prepare a detailed report on the type and extent of contamination at the facility including sources and migration pathways. All information generated during the investigation shall be presented and analyzed. All evidence and procedures used for making any determinations (e.g., velocity of groundwater, extent of contamination) shall be fully documented. The report shall describe extent of contamination (qualitative/quantitative) in relation to background levels indicative for the area. The report shall contain the results of all tests, calculations, inspections, record searches, and observations. It shall contain soil and groundwater contamination profiles, statistical comparisons, and the results of all sampling events conducted as part of the investigation. It shall display results in tables, graphs, maps, and cross sections as discussed in the Data Management Plan and Permit Condition VII.U.3.g.(2).~~

~~The Permittee shall identify all relevant and applicable standards for the protection of human health or the environment (e.g., National Ambient Air Quality Standards, Federally approved State water quality standards, groundwater protection standards, etc.)~~

~~Data shall be evaluated to ensure it is sufficient in quality (e.g., quality assurance procedures have been followed) and quantity to describe the nature and extent of contamination, to evaluate the potential threat to human health and the environment, and to support a CMS, if required. The report shall present all data in an Appendix.~~

~~VII.U.6. General RFI Reporting Requirements~~

~~VII.U.6.a. Five (5) hard copies and one (1) IBM compatible disk copy of all reports and data shall be submitted by the Permittee to the Administrative Authority as specified in Permit Condition VII.B.8.~~

~~VII.U.6.b. The RFI Workplan shall be submitted by the Permittee to the Administrative Authority as described in Permit Condition VII.M.~~

~~VII.U.6.c. The RFI Final Report and Summary shall be submit by the Permittee to the Administrative Authority as described in Permit Condition VII.O.~~

~~**VII.U.6.d.** Within 90 days of the effective date of this Permit, the Permittee shall provide the Administrative Authority with signed, quarterly progress reports as outlined in Permit Condition VII.I.1.~~

~~VII.V. CMS SCOPE OF WORK~~

~~VII.V.1. Purpose~~

~~The purpose of the CMS is to develop and evaluate corrective measures alternatives and to recommend the corrective measure or measures to be taken. The required information shall include each item specified under CMS Tasks IV-VI. The Permittee will furnish the personnel, materials, and services necessary to prepare the CMS, except as otherwise specified.~~

~~If the Permittee believes that certain requirements of the Scope of Work are not applicable, the specific requirements shall be identified and the rationale for inapplicability shall be provided.~~

~~VII.V.2. Scope~~

~~The Corrective Measure Study consists of three tasks:~~

~~Task IV: CMS Plan~~

- ~~a. Description of Current Situation~~
- ~~b. Establishment of Corrective Action Objectives~~
- ~~c. Description of Approach to CMS~~
- ~~d. Schedule for CMS~~

~~Task V: Corrective Measures Study~~

- ~~a. Identification of Corrective Measures Alternatives(s)~~
- ~~b. Screening of Corrective Measures Alternatives(s)~~
- ~~c. Development of Corrective Measures Alternative(s)~~
- ~~d. Evaluation of Corrective Measures Alternative(s)~~
- ~~e. Selection of Corrective Measures Alternative(s)~~

~~Task VI: CMS Final Report and Summary~~

~~VII.V.3. Task IV: CMS Plan~~

~~VII.V.3.a. Description of Current Conditions~~

~~The Permittee shall briefly describe current conditions at the facility to update information provided in the RFI Final Report and Summary. This shall include previous and/or ongoing remedial activity or interim measures.~~

~~**VII.V.3.b. Establishment of Corrective Action Objectives**~~

~~The Permittee shall propose to the Administrative Authority for review and approval, facility specific objectives for the corrective action. These objectives shall be based on public health and environmental criteria, information gathered during the RFI, EPA guidance, and the requirements of any applicable Federal statutes and regulations.~~

~~**VII.V.3.c. Description of Approach to CMS**~~

~~The Permittee shall describe the general approach to the corrective measures study. The approach shall include identification, development, screening, and evaluation of the corrective measures alternatives, as discussed in detail in Permit Condition VII.V.4. The Permittee shall describe specific plans for laboratory and bench scale studies, or field studies, if needed. Specific plans for evaluating remedy effectiveness shall also be developed. The approach shall specify formats to be used for data presentation, including raw data, maps, charts, graphs, engineering schematics, construction design, etc.~~

~~**VII.V.3.d. Schedule**~~

~~The Permittee shall develop a schedule for implementing the corrective measures study, and a schedule for submitting quarterly progress reports on the study implementation.~~

~~**VII.V.4. Task V: Corrective Measures Study**~~

~~The CMS consists of five parts: identification, screening, development, evaluation, and selection of the corrective measures alternative(s).~~

~~**VII.V.4.a. Identification of Preliminary Corrective Measures Alternative(s)**~~

~~Based on the results of the RFI and the CMS Plan objectives, the~~

Permittee shall identify all possible alternatives for removal, containment, treatment and/or other remediation of the contamination.

VII.V.4.b. Screening of Preliminary Corrective Measures Alternatives

The Permittee shall screen the identified preliminary corrective measures alternatives to eliminate those that may not prove feasible to implement, that rely on technologies unlikely to perform satisfactorily or reliably, or that do not achieve the corrective action objective within a reasonable time period. This screening process focuses on eliminating those technologies that have severe limitations for a given set of waste and site-specific conditions. The screening step may also eliminate technologies based on inherent technological limitations.

Site, waste, and technological characteristics that are used to screen inapplicable technologies are described in more detail below:

VII.V.4.b.(1) Site Characteristics. Site data should be reviewed to identify conditions that may limit or promote the use of certain technologies. Technologies whose use is clearly precluded by site characteristics should be eliminated from further consideration;

VII.V.4.b.(2) Waste Characteristics. Identification of waste characteristics that limit the effectiveness or feasibility of technologies is an important part of the screening process. Technologies clearly limited by waste characteristics should be eliminated from consideration.

VII.V.4.b.(3) Technological Limitations. The level of technology development, performance record, and operation and maintenance problems shall be identified for each technology considered. Technologies that are unreliable, perform poorly, or are not fully demonstrated may be eliminated in the screening process.

~~VII.V.4.c. Development of Corrective Measures Alternatives~~

~~The Permittee shall develop corrective measures alternatives based on corrective measures objectives, and identification and screening of preliminary alternatives. The Permittee shall rely on engineering practice to determine which of the previously identified and screened technologies appear most suitable for the site. Technologies can be combined to form the overall corrective measures alternatives. The alternatives developed should represent a workable number of options that each appear to adequately address all site problems and corrective action objectives. Each alternative may consist of an individual technology or a combination of technologies. The Permittee shall document the reasons for excluding technologies.~~

~~When a new technology is proposed or similar waste streams have not routinely been treated or disposed of using the technology, the Permittee shall conduct laboratory and/or bench scale studies to determine the applicability to facility conditions. The Permittee shall analyze the technologies, based on literature review, vendor contracts, and past experience to determine the testing requirements.~~

~~VII.V.4.c.(1) The Permittee shall develop a testing plan identifying the type(s) and goal(s) of the study(ies), the level of effort needed, and the procedures to be used for data management and interpretation.~~

~~VII.V.4.c.(2) Upon completion of testing, the Permittee shall evaluate the testing results to assess the technology or technologies with respect to the site specific questions identified in the test plan.~~

~~VII.V.4.c.(3) The Permittee shall prepare a report summarizing the testing program and its results, both positive and negative.~~

~~VII.V.4.d. Evaluation of Corrective Measures Alternative(s)~~

~~The Permittee shall evaluate each corrective measures alternative developed in Permit Condition VII.V.4.c. The evaluation shall be based on technical, environmental, human health and institutional concerns. The Permittee shall also develop cost estimates for each corrective measure.~~

~~VII.V.4.d.(1) Technical, Environmental, Human Health, and Institutional Concerns~~

~~The Permittee shall provide a description of each corrective measures alternative that includes but is not limited to the following: preliminary process flow sheets; preliminary sizing and type of construction for buildings and structures; and rough quantities of utilities required. The Permittee shall evaluate each alternative in the four following areas:~~

~~VII.V.4.d.(1)(i) Technical~~

~~The Permittee shall evaluate each corrective measure alternative based on performance, reliability, implementability and safety.~~

~~VII.V.4.d.(1)(i)(1) The Permittee shall evaluate performance based on the effectiveness and useful life of the corrective measure:~~

~~VII.V.4.d.(1)(i)(1)(a) Effectiveness shall be evaluated in terms of the ability to perform intended functions such as containment, diversion, removal, destruction, or treatment. The effectiveness of each corrective measure shall be determined either through design specifications or by performance evaluation. Any specific waste or site characteristics that could potentially impede~~

~~effectiveness shall be considered. The evaluation should also consider the effectiveness of combinations of technologies.~~

~~**VII.V.4.d.(1)(i)(1)(b)** Useful life is defined as the length of time the level of effectiveness can be maintained. Each corrective measure shall be evaluated in terms of the projected service lives of its component technologies.~~

~~Resource availability in the future life of the technology, as well as appropriateness of the technologies, must be considered in estimating the useful life of the project.~~

~~**VII.V.4.d.(1)(i)(2)** The Permittee shall provide information on the reliability of each corrective measure including operation and maintenance requirements and demonstrated reliability:~~

~~**VII.V.4.d.(1)(i)(2)(a)** Operation and maintenance requirements include the frequency and complexity of operation and maintenance. Technologies requiring frequent or complex operation and maintenance activities should be regarded as less reliable than technologies requiring little or straightforward operation and maintenance. The availability of labor and materials to meet these requirements shall also be considered.~~

~~**VII.V.4.d.(1)(i)(2)(b)** Demonstrated and expected reliability is a way of measuring risk and effect of failure. The Permittee should evaluate whether technologies have been used~~

~~effectively under analogous conditions; whether the combination of technologies have been used together effectively; whether failure of any one technology has an immediate impact on receptors; and whether the corrective measure has the flexibility to deal with uncontrollable changes at the site.~~

~~**VII.V.4.d.(1)(i)(3)** The Permittee shall describe the implementability of each corrective measure including relative ease of installation (constructibility) and total time required to achieve a given level of response:~~

~~**VII.V.4.d.(1)(i)(3)(a)** Constructibility is determined by conditions both internal and external to facility conditions and includes such items as location of underground utilities, depth to water table, heterogeneity of subsurface materials, and location of facility (i.e., remote location vs. congested urban area). The Permittee shall evaluate what measures can be taken to facilitate construction under site specific conditions. External factors that affect implementation include the need for special permits or agreements, equipment availability, and the location of suitable off site treatment or disposal facilities.~~

~~**VII.V.4.d.(1)(i)(3)(b)** Time has two components to be addressed: the time it takes to implement a corrective measure and the time it takes to see beneficial results. Beneficial results are defined as the reduction of contaminants to acceptable levels as established in the corrective measures objectives.~~

~~**VII.V.4.d.(1)(i)(4)** The Permittee shall evaluate each corrective measures alternative with regard to safety. This evaluation shall include threats to the~~

safety of nearby communities and environments as well as those to workers during implementation. Factors to consider include fire, explosion, and exposure to hazardous substances.

VII.V.4.d.(1)(ii) Environmental

The Permittee shall perform an Environmental Assessment for each alternative. The assessment shall focus on facility conditions and pathways of contamination actually addressed by each alternative.

The Environmental Assessment for each alternative will include at a minimum, an evaluation of the short and long term beneficial and adverse effects of the response alternative, evaluation of any adverse effects on environmentally sensitive areas, and an analysis of measures to mitigate adverse impacts.

VII.V.4.d.(1)(iii) Human Health

The Permittee shall assess each alternative in terms of the extent to which it mitigates short and long term potential exposure to any residual contamination and protects human health both during and after implementation of the corrective measure. The assessment will describe the levels and characterizations of contaminants on site, potential exposure routes, and potentially affected populations. Each alternative will be evaluated to determine the level of exposure to contaminants and the reduction over time. For management of mitigation measures, the relative reduction of impact will be determined by comparing residual levels of each alternative with existing criteria, standards, or regulations acceptable to the Administrative Authority.

VII.V.4.d.(1)(iv) Institutional

The Permittee shall assess relevant institutional

needs for each alternative. Specifically, the effects of Federal, State, and Local environmental and public health standards, regulations, guidance, advisories, ordinances, or community relations on the design, operation, and timing of each alternative shall be considered.

VII.V.4.d.(2) Cost Estimate

The Permittee shall develop an estimate of the cost of each corrective measures alternative and for each phase or segment of the alternative. The cost estimate shall include capital, and operation and maintenance costs.

VII.V.4.d.(2)(i) Capital costs consist of direct and indirect costs.

VII.V.4.d.(2)(i)(1) Direct capital costs include:

VII.V.4.d.(2)(i)(1)(a) Construction costs: Cost of materials, labor (including fringe benefits and worker's compensation), and equipment required to install the corrective measures alternative;

VII.V.4.d.(2)(i)(1)(b) Equipment costs: Costs of treatment, containment, disposal and/or servicing of equipment used to implement the action;

VII.V.4.d.(2)(i)(1)(c) Land and site development costs: Expenses associated with purchase of land and development of existing property; and

VII.V.4.d.(2)(i)(1)(d) Building and services costs: Costs of process and non-process buildings, utility connections, purchased services, and disposal costs.

VII.V.4.d.(2)(i)(2) Indirect capital costs include:

VII.V.4.d.(2)(i)(2)(a) Engineering expenses: Costs of

~~administration, design, construction, supervision, drafting, and testing of corrective measures alternatives;~~

~~**VII.V.4.d.(2)(i)(2)(b)** Legal fees and license or permit costs: Administrative and technical costs necessary to obtain licenses and permits for installation and operation;~~

~~**VII.V.4.d.(2)(i)(2)(c)** Start-up and shakedown costs: Costs incurred during corrective measure start-up; and~~

~~**VII.V.4.d.(2)(i)(2)(d)** Contingency allowances: Funds to cover costs resulting from unforeseen circumstances such as adverse weather conditions, strikes, and inadequate facility characterization.~~

~~**VII.V.4.d.(2)(ii)** Operation and maintenance costs are post-construction costs necessary to ensure continued effectiveness of a corrective measure. The Permittee shall consider the following operation and maintenance cost components:~~

~~**VII.V.4.d.(2)(ii)(1)** Operating labor costs: Wages, salaries, training, overhead, and fringe benefits associated with the labor needed for post-construction operation;~~

~~**VII.V.4.d.(2)(ii)(2)** Maintenance materials and labor costs: Costs for labor, parts, and other resources required for routine maintenance of facilities and equipment;~~

~~**VII.V.4.d.(2)(ii)(3)** Auxiliary materials and energy: Costs of such items as chemicals and electricity for treatment plant operations, water and sewer service,~~

and fuel;

VII.V.4.d.(2)(ii)(4) Purchased services: Sampling costs, laboratory fees, and professional fees which can be predicted;

VII.V.4.d.(2)(ii)(5) Disposal and treatment: Costs of transporting, treating, and disposing of waste materials, such as treatment plant residues, generated during operation;

VII.V.4.d.(2)(ii)(6) Administrative costs: Costs associated with administration of corrective measures operation and maintenance not included under other categories;

VII.V.4.d.(2)(ii)(7) Insurance, taxes, and licensing costs: Costs of such items as liability and accident insurance; real estate taxes on purchased land or rights-of-way; licensing fees for certain technologies; and permit renewal and reporting costs;

VII.V.4.d.(2)(ii)(8) Maintenance reserve and contingency funds: Annual payments into escrow funds to cover costs of anticipated replacement or rebuilding of equipment, and any large unanticipated operation and maintenance costs; and

VII.V.4.d.(2)(ii)(9) Other costs: Items that do not fit any of the above categories.

VII.V.4.d.(2)(iii) Selection of Corrective Measures Alternative(s)

The Permittee shall select a corrective measures alternative using technical, human health, and environmental criteria. At a minimum, the following criteria shall be used to select the final

~~corrective measure or measures.~~

~~**VII.V.4.d.(2)(iii)(1) Technical**~~

~~**VII.V.4.d.(2)(iii)(1)(a)** Performance. Corrective measure or measures which are most effective at performing their intended functions and maintaining performance over extended periods of time will be given preference;~~

~~**VII.V.4.d.(2)(iii)(1)(b)** Reliability. Corrective measure or measures which do not require frequent or complex operation and maintenance activities and have proven effective under conditions similar to those anticipated will be given preference;~~

~~**VII.V.4.d.(2)(iii)(1)(c)** Implementability. Corrective measure or measures which can be constructed and operated to reduce levels of contamination to attain or exceed applicable standards in the shortest period of time will be preferred; and~~

~~**VII.V.4.d.(2)(iii)(1)(d)** Safety. Corrective measure or measures that pose the least threat to the safety of nearby residents and environments as well as workers during implementation will be preferred.~~

~~**VII.V.4.d.(2)(iii)(2) Human Health**~~

~~The corrective measure or measures must comply with existing EPA criteria, standards, or regulations for the protection of human health. Corrective measures that provide the minimum level of exposure to contaminants and the maximum reduction in exposure with time are preferred.~~

~~**VII.V.4.d.(2)(iii)(3) Environmental**~~

~~The corrective measure or measures imposing the~~

least adverse impact or greatest improvement on the environment over the shortest period of time will be preferred.

VII.V.5. Task VI: CMS Final Report and Summary

The Permittee shall prepare a CMS Final Report and Summary presenting the results of the CMS and recommending a corrective action program. The Report shall at a minimum include:

VII.V.5.a. A summary of all the corrective measures alternatives originally identified, and the screening rationale employed. The results of development of each alternative shall be described, and the evaluation of those developed shall be presented in detail. The report will describe the rationale for selection of a corrective measures alternative, including performance expectations, preliminary design criteria and rationale, general operation and maintenance requirements, and long-term monitoring requirements.

The report shall include summary tables that allow the alternative or alternatives to be easily understood. Trade offs among health risks, environmental effects, and other pertinent factors shall be highlighted.

VII.V.5.b. A proposed corrective action program that will attain compliance with concentration level objectives, control sources of releases, meet acceptable waste management requirements, and protect human health and the environment.

VII.V.5.c. Design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, access, easements, and right of way, health and safety requirements, and community relations activities.

VII.V.5.d. Cost estimates and schedules including capital cost estimate, operation and maintenance cost estimate, and project schedule (design, construction, operation).

VII.V.5.e. A schedule for corrective measure (remedy) implementation.

VII.V.6. General CMS Reporting Requirements

VII.V.6.a. Five (5) hard copies and one (1) IBM compatible disk copy of all reports shall be submitted by the Permittee to the Administrative Authority as specified in Permit Condition VII.B.8.

~~VII.V.6.b. The CMS Plan shall be submitted by the Permittee to the Administrative Authority as described in Permit Condition VII.Q.~~

~~VII.V.6.c. The CMS Final Report and Summary shall be submitted by the Permittee to the Administrative Authority as described in Permit Condition VII.S.~~

~~VII.V.6.d. Within 90 days of the date the Permittee is notified to begin a CMS, the Permittee shall provide the Administrative Authority with signed, quarterly progress reports as outlined in Permit Condition VII.I.1.~~

APPENDIX 1

SUMMARY OF CORRECTIVE ACTION ACTIVITIES

Sixty one (61) SWMUs were identified by an EPA contractor during a RCRA Facility Assessment (RFA) in January 1987. Of these, eleven (11) SWMUs were listed in the permit requiring further study and subject to an RFI. In addition to the eleven (11) SWMUs, seven (7) additional areas were identified either as Areas of Concern or potential SWMUs. EPA required on September 28, 1990 that these SWMUs as wells as the areas of concern be investigated for potential releases of contamination.

Notification of the actions taken to investigate the seven additional areas of contamination, summary of findings and planned corrective actions to remediate these locations were provided to LDEQ and EPA, Region VI on January 9, 1990 and March 6, 1990. At request of the EPA (September 28, 1990), the additional seven areas were included in the RFI.

The work plans were submitted and approved by the EPA in January, 1991. The RFI work plan was divided and implemented in three phases.

Phase I (11) SWMUs

- **Sandbed Filter Ponds 1 and 2**
- **East Pond**
- **NPDES Equalization Pond**
- **Old Hazardous Waste Pipeline**
  - **Location No.1, Block F-4**
  - **Location No. 3, Block F-4**
- **Process Block F-5, Location AW-1**
- **Spoil Piles I and 2**
- **Process Block G-7, Location No.7**
- **Background**

Phase II (3) SWMUs

- **Old Hazardous Waste Pipeline, Locations 5, and 6,**
- **Process Block E-4, Location 4**

Phase III (4) SWMUs

- **Waste Oil Recovery Tanks**
- **Waste Oil Storage Area**
- **Pilot Plant Drum Rinsing Area**
- **Old Acid Storage Tank Area**

Table 1: RFI/CMS SUBMISSION SUMMARY

Below is a summary of the planned reporting requirements pursuant to this Permit:

Actions	Due Date
Progress reports on all activities; Permit Condition VII.I.1	As determined by the Administrative Authority
RFI Workplan; Permit Condition VII.M.1	180 calendar days after notification by the Administrative Authority of the requirement to perform an RFI
Implementation of RFI Workplan; Permit Condition VII.N	Within fourteen (14) calendar days after receipt from the Administrative Authority of written approval for the RFI Workplan.
RFI Report and Summary; Permit Condition VII.O.1	Ninety (90) calendar days after completion of the RFI
Revised RFI Report and Summary; Permit Condition VII.O.2	As determined by the Administrative Authority
Mail approved Summary of RFI Report to all individuals on the facility mailing list; Permit Condition VII.O.2	Within Thirty (30) days of approval of the RFI Summary by the Administrative Authority
Notification of newly identified SWMUs and AOCs; Permit Condition VII.J	Thirty (30) calendar days after discovery
Notification of newly discovered releases; Permit Condition VII.K	Fifteen (15) calendar days after discovery
Interim Measures Plan; Permit Condition VII.L	As determined by the Administrative Authority
Revised Interim Measure Plan; Permit Condition VII.P	As determined by the Administrative Authority
CMS Plan; Permit Condition VII.Q.2	Within ninety (90) calendar days after notification of requirement to perform CMS
Revised CMS Plan; Permit Condition VII.Q.3	As specified by the Administrative Authority
Implementation of CMS Plan; Permit Condition VII.R	Within fourteen (14) calendar days after receipt from the Administrative Authority of written approval for the CMS Plan
CMS Final Report and Summary; Permit Condition VII.S.1	Within sixty (60) calendar days after completion of CMS
Revised CMS Final Reports: Permit Condition VII.S.2	As specified by the Administrative Authority
Mail approved Summary of CMS Report to all individuals on the facility mailing list; Permit Condition VII.S.2	Within fifteen (15) days after approval of CMS Summary by the Administrative Authority
Demonstration of Financial Assurance; Permit Condition VII.H.5	As specified in Permit after Permit modification to implement corrective measures
Corrective Measure Remedy Selection/Implementation VII.T	Within thirty (30) days after approval of the CMS Final Report and Summary

Table 2: SWMUs/AOC's REQUIRING AN RFI OR SIMILAR FACILITY INVESTIGATION UNDER A CURRENT CORRECTIVE ACTION

~~PROGRAM~~

~~Below is a list of units being addressed under a current RFI program.~~

~~AOC/SWMU NUMBER~~	~~NAME/DESCRIPTION~~
~~RFI Phase I SWMU~~	~~Sandbed Filter Ponds 1 and 2[3]~~
~~RFI Phase I SWMU~~	~~East Pond[3]~~
~~RFI Phase I SWMU~~	~~NPDES Equalization Pond[3]~~
~~RFI Phase I SWMU~~	~~Spoil Pile 1[1]~~
~~RFI Phase I SWMU~~	~~Spoil Pile 2[1]~~
~~RFI Phase II SWMU~~	~~Process Block E-4, Location 4[1]~~
~~RFI Phase III SWMU~~	~~Pilot Plant Drum Rinsing Area[1]~~

~~1 - Addressed under a current RFI program~~
~~2 - Newly Identified AOC/SWMU (Identified following the issuance of the permit)~~
~~3 - Managed under Solid Waste Permit~~

~~Table 3: SUMMARY OF ONGOING/PROPOSED CORRECTIVE ACTION ACTIVITIES~~

~~Corrective Action~~	~~Unit(s) Affected~~	~~Stage of Corrective Action~~	~~Document~~	~~EDMS~~

Vehicle		Activity	Dates	Document ID#
Groundwater Corrective Action Plan	Tank 112-F	Soil removed and groundwater remediation in progress. Acknowledgement of RECAP-MO-1 Evaluation Report and approval of additional soil sampling.	May 20, 1999 Dec 15, 2003	933867 30203842
Groundwater Corrective Action Plan	Galecron Railcar Loading Area	Conducting groundwater monitoring. Acknowledgement of plug and abandonment and request for mortgage conveyance notification. Submittal of conveyance notice.	Oct 25, 1999 Feb. 3, 2004 May 26, 2004	4374303 30697627 31763017
Groundwater Corrective Action	Acid Storage Tank No. 2404-F	Groundwater remediation in progress	May 7, 2002	22626948
Groundwater Corrective Action	Sutan Production Unit	Groundwater monitoring in progress and approval of remediation plan.	Oct. 16, 1996	1829673
Conventional HSWA RFI Phase II	Process Block E-4, Loc 4	Long-term groundwater monitoring and attenuation. Approval of annual GW monitoring. Short-term monitoring until risk-based closure levels are achieved for a minimum of three consecutive years.	July 9, 1998 Sept. 8, 2003	8077035 29138618
Conventional HSWA RFI Phase III	Pilot Plant Drum Rinsing Area	Resampling and analyzing subsurface soil. Approval of Workplan for soil assessment.	Aug 14, 1995 May 11, 2004	8076548 31621417
Conventional HSWA RFI Phase III	Waste Oil Recovery Tanks & Waste Oil Storage Area	Pending Approval of RFI Phase III Report to grant No Further Action	Aug 14, 1995	8076548
Conventional HSWA RFI Phase III	Old Acid Storage	Pending Approval of RFI Phase III to grant No Further Action	Aug 14, 1995	8076548
Solid Waste Permit GD-047-0224/P-0017	Sandbed Filter Ponds 1 and 2	Closure and Post Closure Plan approved - Currently under Post Closure Care	April 11, 1997	9505183
Solid Waste Permit GD-047-0224/P-0017	East Pond	Closure and Post Closure Plan approved - Currently under Closure activities	July 3, 1996	9505259
Solid Waste Permit GD-047-0224/P-0017	NPDES Equalization Pond	Closure Plan approved - Currently under Post Closure Care	Aug 16, 1995	9505009
Solid Waste Permit	Spoils Pile 1&2 (formerly a	EPA concurrence that	Jan. 8, 1993*	

GD-047-0224/P0017	Conventional HSWA Phase I RFI)	removal of soil to be under authority of LDEQ-SWD. Continuing bioremediation. Approval of Phase I RFI Report-incorporation of Spoils Piles under closure of East Pond.	July 3, 1996 Oct. 21, 1997*	9505259

(*) Denotes copies of these documents are included in Attachment 2 of this permit.

Table 4: AOC/SWMUs THAT RECEIVED NO FURTHER ACTION REQUIRED AT THIS TIME (NFARAT) APPROVALS

SWMU/AOC Number	SWMU Names	Approval Date	EDMS Document

			~~Number~~
~~RFI Phase I SWMU~~	~~Old Hazardous Waste Pipeline, Location 1 Block F-4~~	~~Oct 21, 1997~~	~~8077214~~
~~RFI Phase I SWMU~~	~~Old Hazardous Waste Pipeline, Location 3, Block F-4~~	~~Oct 21, 1997~~	~~8077214~~
~~RFI Phase I SWMU~~	~~Process Block F-5, Location AW-1~~	~~Oct 21, 1997~~	~~8077214~~
~~RFI Phase I SWMU~~	~~Process Block G-7, Location 7~~	~~Oct 21, 1997~~	~~8077214~~
~~RFI Phase II SWMU~~	~~Old Hazardous Waste Pipeline, Location 5~~	~~Aug 4, 1997~~	~~8086699~~
~~RFI Phase II SWMU~~	~~Old Hazardous Waste Pipeline, Location 6~~	~~Aug 4, 1997~~	~~8086699~~

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the Waste Analysis Plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the Permit, including information submittals, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the Corrective Action Strategy must conform to those requirements outlined in the RECAP (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP shall be requested by the Permittee prior to submittal to the Administrative Authority, as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality
Office of Environmental Assessment
Environmental Technology Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

A summary of the planned reporting milestones pursuant to the corrective action requirements of this Permit is found in Condition VIII, Table 1.

VII.A.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken

pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

VII.A.10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana Legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

VII.B EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB AIR REGULATIONS)

VII.B.1. PERFORMANCE STANDARDS FOR EQUIPMENT LEAKS

VII.B.1.a. Operating Requirements

The Permittee shall comply with the applicable requirements under LAC 33:V. Chapter 17 Subchapter B – Equipment Leaks – for all equipment associated with operations that treat, store, or dispose of hazardous waste with organic concentrations equal to or greater than 10 percent by weight.

VII.B.1.b. Monitoring Requirements

The Permittee shall monitor the following equipment for proper operation: pumps in light service, LAC 33:V.1719.A; compressors, LAC 33:V.1721; pressure relief devices in gas/vapor service, LAC 33:V.1723; open-ended valves or lines, LAC 33:1727; valves in gas/vapor service or in light liquid service, LAC 33:V.1737; and pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors, LAC 33:V.1731.

VII.B.1.c. Recordkeeping Requirements

The Permittee shall maintain an up-to-date list identifying each piece of equipment to which LAC 33:V.Chapter 17.Subchapter B applies, and record all information required by LAC 33:V.1743.

VII.B.1.d. Reporting Requirements

A semiannual report shall be submitted to the Administrative Authority in accordance with the requirements of LAC 33:V.1745, based on the date of submittal of the annual report for the facility. A report is not required for a 6-month period during which all pumps in light service, compressors, pressure relief devices in gas/vapor service, open-ended valves or lines, valves in gas/vapor service or in light liquid service, pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors are operated such that during no period of twenty four (24) hours or longer did the devices operate continuously in noncompliance with the applicable operating conditions defined in LAC 33:V.Chapter 17.Subchapter B.

VII.B.2. STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS

The Permittee is exempt from the requirements per Condition V.A.8 of this permit.

VII.B.2.a. Operating Requirements

VII.B.2.a(1) The Permittee shall comply with the applicable requirements of LAC 33:V. Chapter 17, Subchapter C.

VII.B.2.a(2) The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information, and reports as contained in the Part B Permit Application.

VII.B.2.a(3) The Permittee shall, upon request, identify all less than 90-day accumulation tanks or containers, which contain or contact hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1703 to 1715.

VII.B.2.b. Monitoring Requirements

VII.B.2.b(1) The pollution control methods used for tanks shall be inspected on a periodic basis.

VII.B.2.b(2) Tanks meeting Level 1 controls shall be inspected at least once every year, LAC 33:V.1755.C.4.

VII.B.2.b(3) Tanks meeting Level 2 controls shall be inspected in accordance with LAC 1755.E.3 for internal floating roofs, LAC 33:V.1755.F.3 for external floating roofs, LAC 33:V.1755.G.3 for air emission control equipment, and LAC 33.V.1755.I.4 for closed vent control systems.

VII.B.2.b(4) The pollution control methods used for containers shall be inspected on a periodic basis.

VII.B.2.b(5) Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.

VII.B.2.b(6) Level 2 controls shall be inspected in accordance with LAC 33:V.1759.D.4.

VII.B.2.b(7) Level 3 controls shall be inspected in accordance with LAC 33:V.1759.E.4.

VII.B.2.c. Recordkeeping Requirements

Air emission control design documentation shall be maintained in the facility operating record until the equipment is no longer in service. Records must be prepared and maintained for the various equipment and systems used at the facility.

VII.B.2.c(1) Tanks using air emission control records must meet LAC 33:V.1765.B requirements.

VII.B.2.c(2) Container storage areas using Level 3 controls must meet LAC 33:V.1765.D requirements.

VII.B.2.c(3) Closed-vent system and control device systems meeting LAC 33:V.1761 must meet LAC 33:V.1765.E requirements.

VII.B.2.c(4) Facilities exempted by LAC 33:V.1751.C must meet LAC 33:V.1765.F requirements.

VII.B.2.c(5) Components identified as "unsafe to inspect and monitor" in accordance with LAC 33:V.1755.L and 1757.G must meet LAC 33:V.1765.G requirements.

VII.B.2.c(6) Facilities that are governed by this Chapter and use alternate control systems meeting the emission control standards of 40 CFR 60, Subpart VV or 40 CFR 61, Subpart V must meet LAC 33:V.1765.H requirements.

VII.B.2.c(7) All tanks or containers not using air emission controls in accordance with LAC 33:V.1747.D must meet LAC 33:V.1765.I requirements.

VII.B.2.d. Reporting Requirements

VII.B.2.d(1) For each tank, surface impoundment, or container which manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Administrative Authority within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the conditions of LAC 33:V.1751.C, as applicable. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

VII.B.2.d(2) For control devices used in accordance with the requirements of LAC 33:V.1735, a semiannual written report shall be submitted to the Administrative Authority, based on the date of submittal of the annual report, except as provided for in noncompliance situations. The report shall describe each occurrence during the previous six (6)-month period when a control device is operated continuously for twenty-four (24) hours or longer in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or when a flare is operated with visible emissions as defined in LAC 33:V.1707.D. The written report shall include the EPA identification number, facility name and address, an explanation why the control device could not be returned to compliance within 24 hours, and actions taken to correct the noncompliance.

VII.B.2.d(3) The report to the Administrative Authority in accordance with the requirements of VII.B.2.d.1. above is not required for a six (6)-month period during which all control devices subject to LAC 33:V, Subchapter C are operated such that during no period of twenty-four (24) hour or longer did control devices operate continuously in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or a flare operate with visible emissions as defined in LAC 33:V.1707.D.

VII.B.2.d(4) All reports shall be signed and dated by an authorized representative of the Permittee as per LAC 33:V.507.

TABLE VII.B.1
EMISSION CONTROLS FOR TANKS

Tank	Service	LAC Reference(s)	Air Emission Controls
4402-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FA	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FB	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FC	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FD	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FE	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FG	Organic/Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4404-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4604-F1	Bulk (solid/sludge)	LAC 33:V.1755.D.3	Level 2 Controls
4609-F	Sludge Waste	LAC 33:V.1755.D.3	Level 2 Controls
4619-F	Hydro-Recirculation	LAC 33:V.1755.D.3	Level 2 Controls
4620-F	Entrainment Separator/Flue Gas Residuals	LAC 33:V.1755.D.3	Level 2 Controls

TABLE VII.B.2
EMISSION CONTROLS FOR CONTAINERS/CONTAINER STORAGE AREAS

Container/Container Storage Area Identification	LAC Reference(s)	Air Emission Controls
Covered Warehouse	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Truck Unloading Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Incinerator Ash Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

VIII.A. ALTERNATE CORRECTIVE ACTION

VIII.A.1. Introduction to the CAS

This Permit will utilize the CAS Guidance Document (www.epa.gov/Arkansas/6pd/rcra_c/pd-o/riskman.htm) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to

prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A. 2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance

standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

VIII.A.3.a. Use of the Screening Option - The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Use of Management Option 1 – The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may: (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Use of Management Option 2 – The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Use of Management Option 3 – The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary: Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility: Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

VIII.A.6. Summary of Corrective Action Activities: A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Condition VIII, Appendix 1, Table 1 of this permit.

VIII.A.7 Approval of Alternate Schedule: The Permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Condition VIII, Table 1. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS within sixty (60) days of the effective date of this permit. The notice of intent should state the following in a concise manner:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the Permittee will proceed through the CAS;

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, lincluding facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:I.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the "base document" to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a(1) General geographic location;

VIII.D.1.a(2) Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a(3) Facility structures, process areas and maintenance areas;

VIII.D.1.a(4) Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a(5) Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The Permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a(1) Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a(2) Locations of sensitive subpopulations; and

VIII.D.2.a(3) An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of RECAP.

VIII.D.3. Physical Profile

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including: topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a(1) Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a(2) Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a(3) Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a (4) Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a(5) Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a(6) Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a(1) Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a(2) Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a(3) Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a(4) Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim Measures Workplan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.5. Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.6. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

VIII.F.1.a. The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c(1) Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c(2) Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

VIII.F.1.c(3) Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c(4) Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c(5) Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c(6) 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c(7) RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c(8) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c(9) The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems," prepared by the LDEQ and the Louisiana Department of Transportation and Development.** This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c(10) The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

VIII.G.1. The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

VIII.H.1. The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Workplan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The Permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.d. An assessment of the costs of implementation for potential remedies;

VIII.I.5.e. An assessment of the time required to begin and complete the remedy;

VIII.I.5.f. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.g. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT DETERMINATIONS FOR SPECIFIC SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1[1] permit modification ([1] requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1[1] permit modification ([1] requiring Administrative Authority approval) request.

VIII.K.2. FACILITY-WIDE NFA-ATT DETERMINATION

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a sixty (60)-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the sixty (60)-day comment period.

VIII.K.2.g. If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. CONTINUED MONITORING

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. ADDITIONAL INVESTIGATIONS

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the

environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1[1] permit modification request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such

investigations. The plan for investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1^1 permit modification procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1[1] permit modification request under LAC 33:V.321.C.1. The Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1[1] permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

VIII.N.2. Draft Permitting Decision

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

VIII.N.3. Final Remedy Selection

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.N.4. Facility-Wide NFA-ATT

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the Permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

Table 1: Corrective Action Strategy Notification and Reporting Requirements

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the Permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process.

Actions	Due Date
Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	Within sixty (60) days of the effective date of this permit (if facility corrective action is required)
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within sixty (60) days of submittal of the Notice of Intent
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case-by-case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority	Within one-hundred and twenty (120) days after the scoping meeting
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Workplan for the facility investigation to the Administrative Authority (Condition VIII.F)	Within one-hundred and eighty (180) days after the CAS Scoping Meeting

Implement site investigation activities under CAS Investigation Workplan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submittal of Remedial Alternatives Study (RAS) to the Administrative Authority (Condition VIII.I)	Within ninety (90) days of completion of approval of the RECAP Report by the Administrative Authority
Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)	Within sixty (90) days of approval of the RAS by the Administrative Authority
Submit NFA (and Permit Modification) request to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) days after discovery
Notification of newly-discovered releases (Condition VIII.M)	Fifteen (15) days after discovery

APPENDIX 1

SUMMARY OF CORRECTIVE ACTION ACTIVITIES

Sixty one (61) SWMUs were identified by an EPA contractor during a RCRA Facility Assessment (RFA) in January 1987. Of these, eleven (11) SWMUs were listed in the permit requiring further study and subject to an RFI. In addition to the eleven (11) SWMUs, seven (7) additional areas were identified either as Areas of Concern or potential SWMUs. EPA required on September 28, 1990, that these SWMUs as well as the areas of concern be investigated for potential releases of contamination.

Notification of the actions taken to investigate the seven additional areas of contamination, summary of findings and planned corrective actions to remediate these locations were provided to LDEQ and EPA, Region VI on January 9, 1990 and March 6, 1990. At the request of EPA (September 28, 1990), the additional seven areas were included in the RFI.

The work plans were submitted and approved by the EPA in January, 1991. The RFI work plan was divided and implemented in three phases.

Phase I (11) SWMUs

- **Sandbed Filter Ponds 1 and 2**
- **East Pond**
- **NPDES Equalization Pond**
- **Old Hazardous Waste Pipeline**
  Location No.1, Block F-4
  Location No. 3, Block F-4
- **Process Block F-5, Location AW-1**
- **Spoil Piles 1 and 2**
- **Process Block G-7, Location No.7**
- **Background**

Phase II (3) SWMUs

- **Old Hazardous Waste Pipeline, Locations 5, and 6,**
- **Process Block E-4, Location 4**

Phase III (4) SWMUs

- **Waste Oil Recovery Tanks**
- **Waste Oil Storage Area**
- **Pilot Plant Drum Rinsing Area**
- **Old Acid Storage Tank Area**

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED IN THE PERMIT BY REFERENCE
LAD053783445-RN-OP-1
AI#2367

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	EDMS DOCUMENT ID#/TEMPO ACTIVITY#	COMMENTS
Arrangement with local authorities	5/1/52002	23493420	This information is included in Section 6 and Section 15 in the revised stand alone Contingency Plan of the referenced EDMS document.
Closure cost estimates	4/1/2001	18076633 PER19990003	This plan is identified as Appendix A, Attachment 5, Volume IV, to the 4/1/2001 application document.
Closure Plan	4/1/2001	18076633 PER19990003	This plan is identified as Appendix A, Attachment 5, Volume IV, to the 4/1/2001 application document.
Contingency Plan	5/1/2002	23493420	This is a revised stand alone Contingency Plan.
Inspection Plan	4/1/2001	18071823 PER19990003	This plan is identified as Appendix A, Attachment 2, Volume III, of the 4/1/2001 application document.
Security Plan	To be inserted after document review and approval by LDEQ	To be inserted after document review and approval by LDEQ	A revised security plan is to be submitted by the permittee pursuant to the Schedule of Compliance and, upon review and approval by the administrative authority included herein by reference.
Personnel Training Plan	4/1/2001	18077696 PER19990003	This plan is identified as Appendix A, Attachment 4, Volume IV, to the 4/1/2001 application document.
Waste Analysis Plan	4/1/2001	18071823 PER19990003	This plan is identified as Appendix A, Attachment 1, Volume III, to the 4/1/2001 application document.